Sandwell Metropolitan Borough Council's

2025-2030 Air Quality Action Plan Consultation Response Report

Sandwell Metropolitan Borough Council

In fulfilment of Schedule 11 of Environment Act 1995
Local Air Quality Management

November 2025

Executive Summary

Schedule 11 of the Environment Act 1995, as amended by the Environment Act (2021), requires local authorities to consult with public authorities and specified statutory consultees.

Statutory consultees were therefore contacted directly for their feedback, and two public consultations were undertaken. The first general consultation was held from Monday 11 August to Sunday 21 September 2025 and a second more targeted 'schools' consultation' was conducted from Monday 8 September to Monday 29 September 2025.

Sandwell has reviewed the detailed feedback from statutory and non-statutory consultees and will use this information to enhance the Air Quality Action Plan (AQAP). Advice from the UKHSA to integrate health impact models will be achieved by incorporating data derived from the WM-Air AQ-LAT model as well as OHID Fingertips health data. Public access to live air quality data will also be improved by embedding links on our website to the WMCA dashboard, whilst reference to Defra's Air Quality Information Systems Review will be made to support our schools' education initiatives, such as Auntie Duck.

As requested by Mums for Lungs, the AQAP will reference WHO interim air quality targets and explore future stretch targets with WMCA. While School Streets targets are currently undefined, milestones will be set as progress allows. Sandwell will lobby government on domestic wood burning enforcement but will not look to introduce diesel surcharges due to equity concerns.

The consultation surveys received 172 responses to the general survey and 48 responses to the schools' survey, which represents a strong level of engagement for a local authority consultation. The results showed an overrepresentation of White British (73%), women (64%), and adults aged 35–64 (67%). Ethnic minorities, particularly Black and South Asian groups, young people, men, and those with visual impairments were underrepresented. Religious affiliations and health conditions were, however, broadly representative.

Feedback demonstrated that air quality in Sandwell is widely perceived as poor, with most general survey respondents rating it as bad or very bad, and school responses showing similar concerns. However, a significant proportion of participants admitted they lacked sufficient knowledge to give an opinion. Despite this, there is strong consensus that improving air quality should be a priority, with over 70% of respondents across both surveys rating it as important or very important. Support for the Draft Air

Quality Action Plan is high, particularly for measures promoting active travel, partnerships with health professionals, and education initiatives. School Streets and sustainable travel planning were strongly endorsed for their benefits to road safety, health, and pollution reduction, while views on speed limit reductions were more mixed, with safety benefits acknowledged but doubts about their impact on congestion and air quality.

Practical and social concerns were raised, particularly with regards to School Streets, including accessibility for disabled and elderly residents, and costs for low-income households. Requests regarding the need for more reliable public transport and improved infrastructure before restricting car use were also made. School representatives expressed a willingness to engage but noted workload challenges as a barrier. Most respondents were open to modest lifestyle changes such as walking or avoiding unnecessary car trips, though some questioned feasibility and impact. The overall perceived negative impacts of the AQAP were low, with fewer than 30% of general respondents and 15% of school respondents aware of any potential concerns or issues for residents or businesses.

Concerns about traffic displacement and access from School Streets will be managed through evidence-based approaches and equality assessments. Speed limit reductions from 40 to 30mph and 30 to 20mph are supported by local and national evidence for air quality and safety benefits.

Sandwell will continue to work with partners to improve public transport and promote Active Travel, targeting 75% of schools with active travel plans by 2030. The upcoming Local Plan will update air quality policies to reflect new legislation, supported by regional guidance. Awareness campaigns will promote walking and cycling to reduce emissions and improve health.

Overall, the consultation feedback is positive toward improving air quality and implementing AQAP measures, but respondents emphasised the need for balanced, inclusive implementation, clear communication, and strong enforcement to ensure success.

While no adverse impacts were identified in the Equality Impact Assessment, ongoing actions are essential to ensure equitable implementation and to address any unintended effects. This includes conducting Equality Impact Assessments for new interventions, engaging with diverse communities, ensuring accessibility in infrastructure and information, regularly monitoring outcomes, and reviewing complaints biannually to prevent discrimination.

Contents

Introduction

Sandwell Council's Draft Air Quality Action Plan (AQAP) 2025–2030 has been developed in accordance with the Council's statutory responsibilities under the Local Air Quality Management (LAQM) framework. This plan sets out the actions the Council will undertake to improve air quality across the Borough of Sandwell over the five-year period from 2025 to 2030. It supersedes the previous AQAP, which covered the years 2020 to 2025.

We have developed 21 actions that can be considered under seven broad topics:

1) Environmental permits
2) Policy guidance and development control
3) Promoting travel alternatives
4) Public information
5) Transport planning and infrastructure
6) Traffic management
7) Vehicle fleet efficiency

These actions reflect the Council's commitment to protecting the health and wellbeing of residents, with a particular focus on children and young people. A key priority is to encourage behavioural change in travel choices, especially by promoting the uptake of active travel modes such as walking and cycling.

Stakeholder engagement

Under the Environment Act 1995 and the Local Air Quality Management (LAQM) Framework, Sandwell Council has a statutory obligation to consult specific organisations and stakeholders during the development of an Air Quality Action Plan. As part of this process, the following parties were engaged:

- Officers representing departments across Sandwell Council
- Sandwell Council's elected members
- The Secretary of State
- The Environment Agency (EA)
- Neighbouring local authorities, as well as those within the wider West Midlands region
- National Highways
- UKHSA
- The University of Birmingham
- Representatives of local business interests, along with other relevant organisations including education providers, charities, community groups, and healthcare providers.

Sandwell's Draft 2025-2030 AQAP was prepared with the assistance of AECOM Ltd on behalf of Sandwell MBC and with the support and agreement of the following internal departments as well as external stakeholders including: - (1) SMBC Public Health, (2) Development Planning, (3) Transportation Planning, (4) SMBC Environmental Health, (5) Urban Regeneration & Climate

Change, (6) Highways, (7) National Highways, (8) West Midlands Combined Authority, (8) Black Country Transport.

Following a series of meetings and engagement activities with these parties, the draft AQAP was completed in August 2025. The proposed measures were then subject to public and stakeholder consultation.

The final Air Quality Action Plan remains subject to approval by both the Department for Environment, Food and Rural Affairs (Defra) and Sandwell Council's Cabinet. Once adopted, the plan will be subject to ongoing monitoring and evaluation, with progress reported annually through Sandwell's Annual Status Report (ASR). These reports will be made publicly available via the Council's website.

Consultation Methods

Sandwell Council conducted two public consultation surveys to gather feedback on proposed measures. The primary consultation ran from Monday 11 August to Sunday 21 September 2025, offering all stakeholders and residents the opportunity to review and comment on the proposals. A second, targeted 'Schools' Consultation Survey' was held from Monday 8 September to Monday 29 September 2025, specifically aimed at collecting input on actions addressing air pollution in and around school environments.

Stakeholder engagement was achieved primarily through the online surveys. Copies of both of these surveys are provided in **Appendix A**. A range of communication methods were used to maximise reach and participation, including:

- Posts on Sandwell Council's website and social media platforms
- Posters distributed to all libraries across the borough
- Laminated posters displayed in prominent public locations, including parks, train stations, bus stations, car parks, and town centres
- Direct email outreach to local businesses encouraging them to feedback
- Shared via 'ThinkSandwell'
- Inclusion in the Sandwell Council staff briefing
- Inclusion in the weekly newsletter circulated to all schools
- Laminated posters sent to all schools, complete with ties for easy attachment to school gates and railings

Links to the draft AQAP and a request to complete the survey were sent directly by email to a wide variety of key stakeholders, including the Environment Agency, the West Midlands Combined Authority, all local authorities within the West Midlands, UKHSA, NHS and all schools

in the borough. Charitable groups, as well as bodies representing local business interests were also sent this information. Where provided, their responses are included in **Appendix B and C.** Detailed results from both consultation surveys are provided in **Appendix D.**

Summary of Consultation Responses

Statutory Consultation Responses

A summary of the responses to the consultation from statutory consultees is provided in Table 2.1 below. The full responses from statutory consultees are provided in **Appendix C**.

Consultee	Summary of Response
Secretary of State – Department for Environment, Food and Rural Affairs (Defra)	Defra provided constructive feedback on the AQAP in September 2025, recommending the inclusion of an AQMA map and updated NO_2 monitoring data through 2024. They acknowledged the strong public health context and detailed source apportionment using ANPR data and EFT. While no emissions reduction is required due to current compliance, future baselining was commended. Defra noted the need to complete stakeholder engagement details in the final report and welcomed the establishment of a multi-agency steering group. **Recommendations** • Public Health Director Involvement • Further local modelling, if possible, to assess the impact of speed reduction measures.
Environment Agency	The Environment Agency (EA) said they couldn't provide tailored comments on our AQAP due to the volume of plans they review. However, they emphasised the importance of air quality for public health and the environment and outlined their regulatory role under the Environmental Permitting Regulations. They stressed the need for alignment with national and EU standards ($PM_{2.5}$, PM_{10}, NO_2), and recommended adopting London Plan principles like air quality neutrality and positivity. The EA also offered support as an Air Quality Partner under the Environment Act 2021 for sites contributing to exceedances.

	Recommendations
	• Clearly state air quality status, progress, mitigation measures, partnerships, and implementation costs.
	• Adopt best practices from the Mayor of London's Supplementary Planning Documents (SPDs).
	• Ensure major developments are 'air quality neutral'.
	• Include robust air quality assessments, especially for:
	  ○ Construction activities
	  ○ Non-Road Mobile Machinery (NRMM)
	  ○ Transport impacts
	
	Planning and Development
	• Align planning policies with Defra's Interim $PM_{2.5}$ Guidance.
	• Integrate air quality considerations into transport and fleet strategies.
	• Manage emissions from development, construction, and demolition using:
	  ○ IAQM dust guidance
	  ○ NRMM emission standards
	
	Waste Site Management
	• Improve enclosure of existing waste sites to reduce fugitive emissions.
	• Require full enclosure for new waste sites.
	
	Strategic Engagement
	• Encourage early engagement for developments with high potential impact, such as data centres.
	
	Regional Collaboration
	• Promote cross-boundary cooperation between local authorities and regulators to address regional air quality challenges.

UKHSA (United Kingdom Health Security Agency)	UKHSA response demonstrated broad support for the plan, noting our focus on NO_2 and $PM_{2.5}$ and alignment with public health priorities. Including cross-referencing with the Joint Strategic Needs Assessment and Health and Wellbeing Strategy is commended and good public awareness efforts around domestic burning and wood stoves. Key recommendations made include: • Setting long-term targets aligned with WHO guidelines, acknowledging no safe level of particulate pollution.

	• Including health impact modelling (e.g. Years of Life Lost, avoided hospital admissions) alongside environmental metrics. • Using OHID Fingertips data to strengthen the public health case and target interventions. • Fixing the Air Quality Dashboard link, vital for public alerts. • Addressing school-related pollution with anti-idling measures. • Embedding equity and evaluation in intervention design, prioritising proven actions with co-benefits. • Supporting awareness campaigns and consider Defra's Air Quality Information System Review.
National Highways	They attended the AQAP Steering Group meetings and received the draft AQAP and consultation survey via email, but did not submit a separate written response
All Local Authorities in the West Midlands Region	All local authorities in the West Midlands were sent the draft AQAP and consultation survey by email, but no separate responses were received.

Non-Statutory Responses

Consultee	Summary of Response
Mums for Lungs	Mums for Lungs welcomed the draft AQAP and commended the Council's commitment to tackling air pollution, particularly its focus on protecting children and vulnerable groups. They were pleased with the emphasis on School Streets, active travel, domestic wood burning awareness and enforcement, and public engagement, especially with schools and young people. They did however suggest several areas for strengthening the plan: • Referencing WHO interim air quality targets instead of outdated UK legal limits. • Including specific, measurable targets and milestones to track progress (e.g. percentage of schools with School Streets over time).

Consultee	Summary of Response
	• Committing to lobbying central government on domestic wood burning enforcement. • Addressing the impact of diesel vehicles, noting the absence of measures following the rejection of a Clean Air Zone. They suggested alternatives like diesel parking surcharges. Overall, they viewed the plan positively but encouraged more ambition, accountability, and action on key pollution sources.
West Midlands Net-Zero – University of Birmingham	WM- Net Zero supports increased walking and cycling major public health benefits by boosting physical activity among children and parents. Early findings from their Climate-LAT tool show that adopting Dutch cycling levels in the West Midlands could prevent 250 early deaths and over 230 cases of major diseases annually, with Sandwell likely to benefit disproportionately due to existing deprivation. They consider decarbonising the Council vehicle fleet worthwhile and ambitious, but suggest reducing the annual mileage of vehicles, where possible, to curtail non-exhaust emissions from transport. Electrifying transport impacts more on reducing NO_2 than $PM_{2.5}$ exposure. As transport emissions fall, gas boilers and cookers will become larger contributors to NO_2, as evident in central London (https://www.york.ac.uk/news-and-events/news/2025/research/pollution-london-boilers/). Climate-LAT will assess these impacts further, and a briefing on gas hob pollution is available (https://wm-netzero.org.uk/wp-content/uploads/sites/2/2025/02/WM-NZ-Briefing-paper-gas-cooking-WMNZ-Final-2.pdf). Sandwell could consider replacing gas appliances in council housing with electric alternatives where feasible and cost-effective.

Appendix D provides detailed analysis from the information provided by the two consultation surveys. Comments and suggestions falling outside the remit of Sandwell Council have been referred to relevant organisations for their consideration, response, or action.

The following provides a concise summary of these findings:

Summary of Consultation Survey Responses

1. Perceptions of Air Quality

- In the general survey, **54% rated air quality as bad or very bad**, while 28% said good or very good.
- In the school survey, views were split: **40% good/very good**, **39% bad**, and **21% unsure**, showing limited awareness among respondents.

2. Importance of Action

- **73% of general survey respondents** and **83% of school survey respondents** believe it is important or very important for Sandwell Council to prioritise air quality.

3. Support for Proposed Measures

- Strong backing for AQAP measures:
    - **Promoting active travel (77–79%)**, partnerships with NHS (81%), and education schemes (73%).
    - Auntie Duck programme also supported (71%), though some uncertainty due to unfamiliarity.
    - Enforcement of smoke control orders (77%) and new cycle lanes (76%) scored highly, though cycle lanes had the most disagreement (35%).

4. School Streets and Active Travel

- **School Streets** seen as positive: 80% agree they improve road safety; 66% agree they reduce air pollution. Although some respondents also raised concerns about displacement, enforcement, and practicality, particularly regarding parking and traffic in nearby streets.
- Active travel planning widely supported for health benefits:
    - Physical health (92%), mental health (83%), children's health (92%).
    - Road safety (96%) and reducing air pollution (88%) also strongly endorsed.

5. Mixed Views on Speed Limit Reductions

- Agreement on reducing collisions (62%) and noise (54%), but less confidence in reducing air pollution (46%) or congestion (34%).

Concerns and Barriers Raised

- Accessibility and fairness, with worries about impacts on disabled, elderly, and low-income residents.
- Practicality, concerns about unreliable public transport and infrastructure gaps cited as barriers.
- Cost and feasibility, that lifestyle changes needed were seen as being unrealistic for some households.
- Schools noted workload challenges in implementing schemes.

Lifestyle Changes

- Most respondents were open to modest actions like walking or avoiding unnecessary car trips.
- Appetite for systemic actions (tree planting, renewable energy) was limited.

Perceived Negative Impacts

- General survey: around 29% considered there could be possible negative impacts on residents, 27% on businesses.
- School survey: 15% aware of impacts on residents, 13% on businesses.

Summary of Feedback

Broad support for improving air quality and implementing AQAP measures, especially active travel and education initiatives. However, feedback highlights scepticism about speed limits, concerns about fairness and practicality, and a need for clear communication, enforcement, and infrastructure improvements.

Suggested changes to the AQAP following consultation

Feedback from both statutory and non-statutory consultees has been carefully reviewed and considered. Below, we outline our responses to the key recommendations and concerns which have been raised. While we have not added or removed any of the 21 proposed measures, we have made several amendments to the text to incorporate some of the recommendations received.

Response to Defra Recommendations

Provision of an AQMA Map

As requested this map has now been provided – see Figure 2.1

Details of NO^2 concentrations for 2024 should be included

Details of monitored NO_2 concentrations over the past five years, including distance-corrected values, have now been incorporated into the final Air Quality Action Plan (AQAP) to provide an up-to-date overview. These figures were not included in the draft AQAP as the 2025 Annual Status Report (ASR) was still pending approval by Defra at the time of submission for consultation.

Public Health Director Involvement

Sandwell's Draft Air Quality Action Plan has been subject to involvement from both Liann Brookes-Smith and Frances Howie, both interim Directors of Public Health at Sandwell Council during the creation of this AQAP.

Further modelling

A recommendation was made to undertake further modelling to determine the impact of speed reduction measures on Birmingham Road in Oldbury. Although this is something which we would be keen to do as a local authority, it is likely to be unfeasible due to other budget pressures.

Response to the Environment Agency Feedback

We welcome the Environment Agency's input and acknowledge the importance of aligning our Air Quality Action Plan with national and EU standards. We intend to incorporate the EA's recommendations, including best practice approaches to planning, development, and waste site management, and will continue to engage with the EA as an Air Quality Partner under the Environment Act 2021.

Response to UKHSA Recommendations

Health Impact Modelling

UKHSA recommended incorporating health impact modelling, such as Years of Life Lost and avoided hospital admissions, alongside traditional environmental indicators within the Air Quality Action Plan (AQAP). This is an important issue, and Sandwell is committed to integrating these health-focused assessments into both ongoing and future air quality monitoring and reporting, reflecting this within our AQAP. We therefore plan to utilise the Air Quality Life Assessment Tool (AQ-LAT) model developed by WM-Air at the University of Birmingham, to improve the accuracy and breadth of our health impact evaluations. This enhanced approach will enable a more comprehensive understanding of how air quality improvements benefit public health and will support more informed decision-making.

Integrating Health Data

Sandwell also acknowledges the recommendation to strengthen the public health case by systematically integrating and discussing relevant data from the Office for Health Improvement & Disparities (OHID) Fingertips platform to better evidence and target local action. We recognise the importance of key air quality indicators at the local authority level, including the fraction of

mortality attributable to particulate air pollution and levels of fine particulate matter. This information is included in section 3.1 of the report, but specific reference has now been made to the Fingertips data resources used as well as a reminder that this information is also included in our Air Quality Annual Status Reports. We will also endeavor to build in health data where appropriate when undertaking our air quality measures.

Access to Live Air Quality Data

We acknowledge that the current Air Quality Action Plan (AQAP) does not explicitly discuss the importance of providing public access to live air quality data. Sandwell is committed to ensuring transparency and accessibility to air quality data by maintaining up-to-date information on our website. We have ensured that direct links to the West Midlands Combined Authority (WMCA) air quality dashboard are now provided. This will enable residents and stakeholders to view real-time and historic air quality conditions at 13 sites across Sandwell and a further 77 sites across the West Midlands region.

Addressing school-related pollution with anti-idling measures

UKHSA suggested that Sandwell Council may wish to consider a strategy for encouraging anti-idling to improve air quality near schools, e.g. anti-idling using signage and raising greater public awareness or even enforcement for prolonged idling offences. Sandwell Council are keen for anti-idling campaigns to be included as part of our general air quality campaign work in the coming years, potential methods of delivery include utilising our Auntie Duck air quality education programme and ModeShift STARS initiatives with schools.

Supporting awareness campaigns and consider following guidance provided in Defra's Air Quality Information System Review

UKHSA support air quality awareness-raising initiatives, including alerts and campaigns that provide information and advice to both businesses and the public, but recommends applying the principles as identified in Defra's Air Quality Information System (AQIS) review[1]. This is helpful advice, and we will ensure that we incorporate the communication, education, indices/advice and evaluation principles from this review in our future work.

For example, with regards education, the AQIS review highlights the important role that young people play in raising the profile of air quality as a social issue and the importance of embedding air quality lessons in primary and secondary education. Identifying that this can foster enthusiasm among pupils and leverage the influence that young people can have on their families and communities. Sandwell is already actively applying this this through our Auntie Duck Air Quality Education Programme and in the future through the 'all schools' AQ toolkit, currently being developed in partnership with the West Midlands Combined Authority (WMCA).

Defra's Air Quality Information System (AQIS) review also highlights the importance of working with professional health bodies and regulators to upskill healthcare professionals on the health

[1] https://uk-air.defra.gov.uk/research/aq-system-review/

impacts of air pollution, enabling them to provide appropriate, actionable advice to the public and vulnerable groups. Sandwell has already taken steps in this area through collaboration with the NHS and the Children and Young People's Asthma Transformation Team. Not only do we plan to continue this work, but we also want to expand this approach to other professional sectors, such as housing teams, and incorporate guidance on indoor air quality.

The AQIS review also identifies the need to embed evaluation into the design of any interventions from the outset, ensuring that we systematically collect evidence of their impact and effectiveness. This principle is central to our approach, and we are committed to integrating robust evaluation processes across all future interventions to demonstrate outcomes and inform continuous improvement.

Response to Mums for Lungs recommendations

Referencing WHO interim air quality targets instead of outdated UK legal limits.
Sandwell recognises the importance of aligning air quality ambitions with the latest health evidence. While we will continue to comply with current UK legal limits, we have now referred to the World Health Organisation's Interim Air Quality Target 3 and Guideline Value within our Air Quality Action Plan (AQAP) in section 2.2 'Public Exposure' to demonstrate both our understanding and commitment to improving air quality and protecting public health. Furthermore, we are working closely with the West Midlands Combined Authority (WMCA) to explore the adoption of stretch targets based on WHO interim targets which we could be included in either future iterations of our AQAP or in an Air Quality Strategy.

Including specific, measurable targets and milestones to track progress (e.g. percentage of schools with School Streets over time).
We recognise the importance of including specific, measurable targets and milestones to track progress, such as the percentage of schools with School Streets over time. However, at this early stage, it is challenging to set definitive targets due to uncertainties around the number of schools that we can feasibly implement School Streets. However, the Council are committing to this measure in the AQAP and once we have more information, we will set realistic and achievable targets in future and include these in our Air Quality Annual Status Report.

Committing to lobbying central government on domestic wood burning enforcement.
Sandwell will advocate for campaigns and initiatives designed to strengthen and improve enforcement and education regarding the harm created by domestic wood burning. Sandwell recognises its significant impact on local air quality hence the designation of the whole borough as a Smoke Control Area in 2022. We will take proactive action to reduce emissions from this source and protect public health.

Diesel surcharging
While we acknowledge concerns around diesel emissions, implementing a diesel surcharge is not currently being considered by Sandwell due to concerns about equity and the disproportionate impact such a measure could have on lower-income households. Diesel

vehicles are often older and more affordable options for people on limited incomes who may not have the financial means to upgrade to cleaner vehicles quickly. Introducing a surcharge could therefore place an unfair financial burden on these residents, exacerbating existing social and economic inequalities. Sandwell is committed to pursuing air quality improvements that are both effective and equitable, ensuring that measures do not unfairly impact vulnerable or disadvantaged communities.

West Midlands Net-Zero – University of Birmingham recommendations

We appreciate WM-Net Zero's evidence-based recommendations and recognise the significant public health benefits of active travel and fleet decarbonisation. We will explore opportunities to reduce the Council's vehicle mileage and consider the feasibility of replacing gas appliances in council housing with electric alternatives, where these are cost-effective. We also welcome further collaboration through the Climate-LAT tool to assess emerging sources of NO_2 and how this can be used more widely across the Council to inform our future actions and policy making.

Responses to concerns identified in the Public and Schools Consultation Surveys

School Streets – Traffic displacement and access for those with disabilities

We acknowledge respondents' concerns about potential traffic displacement and access issues related to the introduction of more School Streets. A review of evidence from national studies and local experience shows that well-designed School Streets do not significantly displace traffic onto neighbouring roads. Instead, they encourage walking, cycling, and sustainable travel, leading to stable or reduced traffic levels nearby. Appropriate exemptions for residents, emergency services, and priority vehicles are always required to ensure essential access is maintained. An equality impact assessment will be undertaken wherever a School Street is proposed so that the needs of all community members are adequately considered.

This approach is supported by research from a wide variety of institutions and organisations including Edinburgh Napier University 2020 , the University of Westminster (2025),and Sustrans 2022.

Speed limit reductions – scepticism regarding potential for reducing local air pollution

There is evidence to demonstrate that reducing speed limits from 40mph to 30mph or 30mph to 20mph on certain roads can help lower air pollution.

Sandwell Council's modelling on All Saints Way (A4031) indicates that reducing the speed limit from 40mph to 30mph can lead to improved air quality. The modelling forecasts reductions in nitrogen dioxide (NO_2) and particulate matter (PM) levels, contributing to better public health outcomes. Sandwell Council

Additionally, a trial in Dorset on the A35, where the speed limit was reduced from 40mph to 30mph, resulted in a small but measurable decrease in nitrogen dioxide levels. This suggests that similar reductions in Sandwell could yield comparable air quality benefits (Motoring Research).

Studies have shown reductions in particulate matter and nitrogen oxides emissions following the introduction of 20mph limits. For example, Edinburgh saw an 8% drop in particulate matter levels after implementing 20mph zones (Burwell Parish Council). Research by Imperial College London also found significant emission reductions from diesel vehicles at 20mph, comparable to removing many petrol cars from the road (20's Plenty for Us). Transport for London highlights that consistent 20mph driving improves fuel efficiency, reducing pollutants (www.gov.wales). While some areas report minimal impact due to local factors, evidence supports that 20mph limits on busier roads contribute to better air quality and health.

Public Transport and Active Travel Infrastructure Gaps

Sandwell recognises that improving public transport infrastructure is vital to reducing reliance on private vehicles and improving air quality. To address existing gaps, we are working collaboratively with the West Midlands Combined Authority (WMCA), local bus operators, and other partners to enhance services by expanding route coverage, increasing frequency, and improving accessibility.

In addition, Sandwell promotes Active Travel i.e. walking, wheeling, and cycling, by supporting schools and businesses with tailored guidance through a dedicated Active Travel Officer. Progress will be tracked via the Modeshift STARS platform, aiming for 75% of schools to have accredited Active Travel Plans by 2030. This supports wider council and national policies and enhances initiatives like School Streets.

A new Local Plan, expected in 2026, includes an air quality policy referencing outdated guidance that requires updating due to recent legislative changes and the likely revocation of the AQMA in 2027. Sandwell plans to review and update technical guidance to maintain strong air quality considerations in planning, with support anticipated from WMCA's developing regional guidance.

Sandwell also runs awareness campaigns promoting walking and cycling, highlighting cycle paths, green spaces, and canal routes to encourage healthier, low-pollution travel options. These efforts, alongside the Active Travel Officer role, form part of a comprehensive approach to improving transport infrastructure and reducing harmful emissions.

APPENDIX A - Consultation Survey Information

General Survey

Sandwell Council's Draft Air Quality Action Plan Consultation Survey

Air Quality in Sandwell

The whole borough of Sandwell was declared as an Air Quality Management Area (AQMA) in July 2005 due to widespread exceedances of the legal national air quality objective for nitrogen dioxide (NO2). Although monitoring has demonstrated compliance with legal NO2 standards for the last three years, these standards must be consistently maintained for at least five years before the declaration can be lifted.

When the AQMA was first declared, NO_2 was the primary pollutant of concern due to its impact on public health. However, fine particulate matter (PM2.5) is now widely recognised as a more serious threat, as there is no known safe level of exposure. As a result, this updated Air Quality Action Plan (AQAP) expands its focus to include PM2.5, alongside continued efforts to manage NO_2 emissions.

Sandwell's Proposed Air Quality Action Plan

In this AQAP, we outline how we plan to effectively tackle air quality issues within our control. Sandwell has no plans to introduce a Clean Air Zone (CAZ) like Birmingham. This is because Sandwell's air pollution is more widespread due to having multiple towns and many busy traffic routes and no city centre.

Our priorities include protecting the health of children and young people within the Borough and promoting a range of sustainable travel choices for everyone, with a particular focus on the adoption of active travel e.g. walking and cycling.

We are proposing 21 actions/measures that can be considered under seven broad topics:

- Promoting travel alternatives
- Public information

- Transport planning and infrastructure
- Policy guidance and development control
- Traffic management
- Vehicle fleet efficiency
- Environmental permits

You can read Sandwell's Draft Air Quality Action Plan by clicking on this link https://www.sandwell.gov.uk/consumer-advice/air-quality/2

Do you agree to take part in this survey being carried out on behalf of Sandwell Council? The data collected will be used to improve the services we offer to our customers. Special category or personal data may be collected as part of this research - completion of these questions is optional. Please refer to our privacy statement for further details.

- **I am happy to take part in this survey on behalf of Sandwell Council** ☐
- **I do not want to take part in this survey** ☐

1. Are you completing this survey:

As a Sandwell resident ☐
As a worker in Sandwell ☐
As a regular visitor to Sandwell ☐
On behalf of a community organisation or charity ☐
On behalf of an educational establishment ☐
On behalf of a health establishment ☐
On behalf of a sports or fitness establishment ☐
On behalf of a business ☐
As a local authority, transport or regional authority representative ☐
As a political representative ☐
Other ☐

Air Pollution in Sandwell

Air pollution is a significant public health concern, contributing to heart disease, cancer, stunting lung growth in children and worsening respiratory conditions such as asthma and COPD. Vulnerable groups such as children, older adults, and those with pre-existing health conditions are particularly affected.

2. Do you think air quality in Sandwell is:

Very Good ☐
Good ☐
Bad ☐
Very Bad ☐
Don't know / Can't say ☐

3. How important do you think it is for Sandwell Council to prioritise air quality?

Very important	☐
Important	☐
Somewhat important	☐
Somewhat unimportant	☐
Unimportant	☐
Very unimportant	☐
Don't know / Can't say	☐

Actions to Improve Local Air Quality in Sandwell

We have 21 proposed actions to improve air quality in Sandwell. Although we propose to implement all these measures three have been chosen as being a priority to implement, these are:

- School Streets
- Promoting Active/Sustainable Travel
- Road speed reductions

School Streets Information

A School Street is a road outside a school that has temporary restrictions during drop-off and pick-up times to reduce school-related and through traffic. Access is still permitted for residents, emergency services, and other essential users.

The Council can now enforce School Streets using portable cameras, removing the need for school staff or volunteers to monitor them. These schemes help reduce traffic and engine idling near school gates, making the environment safer and healthier for children. They also encourage families to consider alternative ways of travelling to school, such as walking, cycling, or public transport. Not all schools will be suitable for a School Street, and any implementation will follow consultation with parents, staff, and local residents.

4. To what extent do you agree that expanding School Streets in Sandwell will:

	Strongly Agree	**Agree**	**Neither Agree nor Disagree**	**Disagree**	**Strongly Disagree**
Reduce Air Pollution	☐	☐	☐	☐	☐
Improve Road Safety	☐	☐	☐	☐	☐
Improve residents access to properties during drop-off and pick-up times	☐	☐	☐	☐	☒
Improve access for priority vehicles e.g. disabled, emergency vehicles	☐	☐	☐	☐	☐

4a. Do you have any further comments about School Streets?

No ☐

Yes ☐ please write comments in the box below:

Planning Active/Sustainable Travel

Active Travel refers to everyday journeys made by walking, wheeling, or cycling for a specific purpose, such as commuting to work or school. Sandwell Council would like to build on and create new partnerships with schools and businesses to help them develop travel plans that support sustainable commuting as a viable alternative to car use.

Active travel supports children's health, boosts concentration, reduces anxiety, and encourages lifelong healthy habits. For adults, it strengthens social ties and lowers the risk of chronic diseases - benefiting both individuals and communities.

5. To what extent do you agree that active and sustainable travel planning in Sandwell will:

	Strongly Agree	**Agree**	**Neither Agree nor Disagree**	**Disagree**	**Strongly Disagree**
Reduce Air Pollution	☐	☐	☐	☐	☐
Improve Road Safety	☐	☐	☐	☐	☐
Improve physical health and wellbeing	☐	☐	☐	☐	☐
Improve mental health and wellbeing	☐	☐	☐	☐	☐
Create a healthier workforce	☐	☐	☐	☐	☐
Improve health and wellbeing of children	☐	☐	☐	☐	☐

5a. Do you have any further comments about active and sustainable travel planning in Sandwell?

No ☐

Yes ☐ please write your comments in the box below:

Road Speed Reductions

Lowering the speed limit on certain roads can help to reduce exhaust emissions from stop-start traffic and the release of particulate matter from tyre and brake wear. Whilst this measure cannot be used on all roads, speed reductions from 30mph to 20mph are most likely to be suitable for use in our town centres, residential areas and roads by schools. Roads where there are more constant traffic speeds are less likely to be considered for any speed reduction measures.

Speed reduction also brings additional benefits in terms of improving road safety, encouraging active travel and reducing carbon emissions.

6. To what extent do you agree that reducing the speed limit on some roads in Sandwell will:

	Strongly Agree	**Agree**	**Neither Agree nor Disagree**	**Disagree**	**Strongly Disagree**
Reduce Air Pollution	☐	☐	☐	☐	☐
Reduce collisions and severity of collisions	☐	☐	☐	☐	☐
Reduce congestion – decrease overall journey times	☐	☐	☐	☐	☐
Be safer for vulnerable users e.g. children, elderly, disabled	☐	☐	☐	☐	☐
Reduce road traffic noise from engines and tyre/road interaction	☐	☐	☐	☐	☐
Promotes walking, scooting and cycling	☐	☐	☐	☐	☐
Reduce carbon emissions	☐	☐	☐	☐	☐
Improve health and wellbeing of children	☐	☐	☐	☐	☐
Improve road safety	☐	☐	☐	☐	☐

6a. Do you have any further comments about proposed road speed reductions in Sandwell?

No ☐
Yes ☐ please write your comments in the box below:

Additional Measures to Improve Air Quality

Below are the further 18 proposed air quality measures to be actioned over the next five years. Further details of each of these measures can also be found in Sandwell's draft Air Quality Action Plan, along with information existing air quality how we and our partners will work towards air quality improvements.

7. To what extent do you agree with the following proposed measures?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
4. Produce updated air quality guidance to support planning application decisions	☐	☐	☐	☐	☐
5. The promotion of active travel (e.g. walking and cycling)	☐	☐	☐	☐	☐
6. Roll out of the Auntie Duck Children's Air Quality Education Programme to all primary schools in Sandwell	☐	☐	☐	☐	☐
7. Contribute to and promote an accredited air quality education scheme for primary and secondary schools which aligns with the national curriculum funded by the West Midlands Combined Authority	☐	☐	☐	☐	☐
8. Education and enforcement of Sandwell's Smoke Control Order – controlling smoke emissions from chimneys	☐	☐	☐	☐	☐
9. Providing advice and guidance on planning applications to ensure air pollution is minimised during construction and when development is in use	☐	☐	☐	☒	☐
10. Targeted public health engagement campaigns to raise awareness of air pollution	☐	☐	☐	☐	☐
11. Creation of new cycle lanes / infrastructure	☐	☐	☐	☐	☐
12. Raise awareness of harms from domestic burning e.g. log burning stoves and bonfires	☐	☐	☐	☐	☐
13. Partner with the West Midlands Combined Authority to support the implementation of the West Midlands Air Quality Framework	☐	☐	☐	☐	☐

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
14. Ensure Sandwell's interests are embedded into the West Midlands Local Transport Plan, to maximise local air quality benefits	☐	☐	☐	☐	☐
15. Work with trusted community leaders to improve knowledge and ownership of Air Quality to enable them to create their own initiatives	☐	☐	☐	☐	☐
16. Review how money obtained from the Community Infrastructure Levy and Section 106 agreements can be best spent	☐	☐	☐	☐	☐
17. Issue environmental permits to all businesses that require them and ensure on-going air quality compliance	☐	☐	☒	☐	☐
18. Work with the Environment Agency to ensure Sandwell businesses achieve on-going air quality compliance	☐	☐	☐	☐	☐
19. Replacement of existing Council vehicle fleet for zero-emission vehicles in line with the government's 2035 path to zero emissions vehicles	☐	☐	☐	☐	☐
20. Partnership working with NHS health professionals e.g. school nurses, asthma specialists	☐	☐	☐	☐	☐
21. Maintenance of the existing Air Quality council website to provide information on air quality matters	☐	☐	☐	☐	☐

7a. Do you have any further comments about these 18 proposed measures?

No ☐

Yes ☐ **please comment below:**

8. Are there any other actions that you think we should be doing to reduce local air pollution in Sandwell?

No ☐

Yes ☐ **please comment below:**

Do you have any concerns about the impact of the measures proposed in the draft Air Quality Action Plan (AQAP)? Please answer the following questions:

		Yes	No
9.	Are you aware of any negative impact that the AQAP could have on residents or visitors to Sandwell?	☐	☐
10.	Are you aware of any negative impact that the AQAP could have on Sandwell's businesses or economy?	☐	☐

11. Do you think this AQAP could discriminate against someone because of their:	**Yes**	**No**
Age	☐	☐
Religion or belief	☐	☐
Disability	☐	☐
Gender reassignment	☐	☐
Marriage or civil partnership	☐	☐
Pregnancy or maternity	☐	☐
Race	☐	☐
Sex	☐	☐
Sexual Orientation	☐	☐

11a. If you answered yes to any of the above, please give details of why below:

12. What lifestyle or behaviour changes would you be willing to make to reduce local air pollution? *Please tick all that apply*

☐	Walk my child/children to school
☐	Use a bicycle or walk for short local journeys
☐	Use bus, train, tram more instead of using own car
☐	Turn car engine off when stationary at traffic lights or parked
☐	Use a car club rather than purchasing/replacing my car (membership to club allows you to use on-street cars, where you pay to use a vehicle by the day or hour, without the responsibilities of car ownership).
☐	Car share with family, friends, colleagues to attend work, school, leisure activities
☐	Only burn dry, well-seasoned wood or smokeless fuel on your stove, open fire or barbeque
☐	Replace my gas boiler with alternative lower-emission technology e.g. air source heat pump, solar thermal panels, and solar panels

☐	Replace my wood burning stove with an alternative lower-emission heating appliance e.g. gas boiler, air source heat pump, solar thermal panels and solar panels
☐	Improve my understanding of air pollution by visiting the Council's or other relevant websites regularly
☐	Replace my current vehicle with an electric vehicle or other ultra-low emission alternatives
☐	Install an electric charging point at my property if possible
☐	Other

12a. If you ticked 'other' please specify below:

13. What changes is your organisation willing to make to improve poor air quality? Other, please specify

About You...

You do not have to answer these questions but by doing so you are helping to ensure any interventions effectively meet the needs of all our service users. Your data is important to us and we won't share the information you provide with anyone else. Your information will only be used and reported anonymously to support this project.

We recognise how important it is to protect the privacy of your information. All responses received will be stored and subject to General Data Protection Regulations. For more detail on how we store your data, please visit Sandwell Council's Privacy Notice.

What is your age?

☐	Under 16
☐	16-24
☐	25-34
☐	35-49
☐	50-64
☐	65-74
☐	75 and over
☐	Prefer not to say

What is your sex?

☐	Male
☐	Female

To which of these groups do you consider you belong?

White

☐	English / Welsh / Scottish /British / Northern Irish
☐	Irish
☐	Gypsy / Irish Traveller
☐	Roma
☐	Polish
☐	Other White background - please specify:

Mixed / multiple heritage

☐	White and Black Caribbean
☐	White and Black African
☐	White and Asian
☐	Other Mixed or Multiple ethnic groups – please specify:

Asian or Asian British

☐	Indian
☐	Pakistani
☐	Bangladeshi
☐	Chinese
☐	Other Asian background – please specify:

Black or Black British

☐	African
☐	Caribbean
☐	Other Black background – please specify:

Other ethnic group

☐	Arab
☐	Sikh
☐	Jewish
☐	Other ethnic background – please specify:
☐	Prefer not to say

What is your religion?

☐	No religion
☐	Christian
☐	Jewish
☐	Hindu
☐	Muslim
☐	Sikh
☐	Buddhist
☐	Other – please specify:
☐	Prefer not to say

Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?

No ☐
Yes ☐

If you answered **'Yes'** to the above**:**

Do any of your conditions or illnesses reduce your ability to carry out day-to-day activities?

☐	Yes, a lot
☐	Yes, a little
☐	Not at all

If yes, what type of physical or mental impairment?

☐	Physical disability
☐	Blindness or visual disability
☐	Deafness or hearing impairment
☐	Learning difficulty
☐	Mental health
☐	Longstanding illness or health conditions (e.g. HIV, cancer, chronic heart disease etc.)
☐	Other

Please provide your full postcode _____

Thank you for taking the time to complete this survey.

Schools' Survey Consultation

Air Quality in Sandwell

In July 2005, Sandwell was officially designated as an Air Quality Management Area (AQMA) due to widespread breaches of national legal limits for nitrogen dioxide (NO_2), a pollutant known to harm human health. While NO_2 concentrations have fallen in recent years, there is growing concern over the health impacts of exposure to fine particulate matter (PM2.5), which continues to be present at elevated levels across many parts of the borough. As a result, this updated Air Quality Action Plan (AQAP) expands its focus to include PM2.5, alongside continued efforts to manage and reduce NO_2 emissions.

Sandwell's Proposed Air Quality Action Plan

In this AQAP, we outline how we plan to effectively tackle air quality issues within our control. Sandwell has no plans to introduce a Clean Air Zone (CAZ) like Birmingham. This is because Sandwell's air pollution is more widespread due to having multiple towns and many busy traffic routes and no city centre.

Our priorities are focused on protecting the health of children and young people within the borough and promoting a range of sustainable travel choices for everyone, with a particular focus on the adoption of active travel e.g. walking and cycling. Reducing exposure to air pollution provides immediate and long-term health benefits to children, school staff and nearby residents.

We are proposing 21 actions/measures in total, but we are keen to hear your views on the five actions/measures which could have an impact on air quality around schools. The five actions/measures, and their listed number in the AQAP, are:

1. School Streets
3. Active Travel Planning

5. Active Travel Promotion
6. The Auntie Duck Air Quality Education Program
7. An accredited education scheme for schools

You can read Sandwell's Draft Air Quality Action Plan by clicking on this link https://www.sandwell.gov.uk/consumer-advice/air-quality/2

Do you agree to take part in this survey being carried out on behalf of Sandwell Council? The data collected will be used to improve the services we offer to our customers. Special category or personal data may be collected as part of this research - completion of these questions is optional. Please refer to our privacy statement for further details.

- **I am happy to take part in this survey on behalf of Sandwell Council** ☐
- **I do not want to take part in this survey** ☐

Are you completing this survey:

As a Sandwell school employee	☐
As a parent of a child/ren at a school in Sandwell	☐
As a Sandwell resident living within 100 metres of a school entrance	☐
As a regular visitor to/a Sandwell school(s)	☐
As a Sandwell school governor	☐
As a worker in Sandwell	☐
As a regular visitor to Sandwell	☐
On behalf of a community organisation or charity	☐
On behalf of an education establishment	☐
On behalf of a health establishment	☐
On behalf of a sports or fitness establishment	☐
On behalf of a business	☐
As a local authority, transport or regional authority representative	☐
As a political representative	☐

Air Pollution in Sandwell

Air pollution is a significant public health concern, but for children the impacts can be particularly serious, for example, exposure to high concentrations of air pollutants can permanently stunt lung growth and worsen respiratory conditions such as asthma.

1. Do you think air quality in Sandwell is:

Very Good	☐
Good	☐
Bad	☐
Very Bad	☐

Don't know / Can't say ☐

2. **Do you have an interest in a specific school in Sandwell (e.g. work there, children attend, live near, school governor)?**

Yes ☐
No ☐

If yes, which school? Please write name of school box below:

3. **Do you think air quality around the above named school is:**

Very Good ☐
Good ☐
Bad ☐
Very Bad ☐
Don't know / Can't say ☐

3a. Why do you think this?

4. **How important do you think it is for Sandwell Council to prioritise air quality?**

Very important ☐
Important ☐
Somewhat important ☐
Somewhat unimportant ☐
Unimportant ☐
Very unimportant ☐
Don't know / Can't say ☐

Actions to Improve Local Air Quality in Sandwell

We have 21 proposed actions to improve air quality in Sandwell. Although we propose to implement all these measures three have been chosen as being a priority to implement, these are:

- School Streets
- Promoting Active/Sustainable Travel
- Road speed reductions

School Streets Information

A School Street is a road outside a school that has temporary restrictions during drop-off and pick-up times to reduce school-related and through traffic. Access is still permitted for residents, emergency services, and other essential users.

The Council can now enforce School Streets using portable cameras, removing the need for school staff or volunteers to monitor them. These schemes help reduce traffic and engine idling near school gates, making the environment safer and healthier for children. They also encourage families to consider alternative ways of travelling to school, such as walking, cycling, or public transport. Not all schools will be suitable for a School Street, and any implementation will follow consultation with parents, staff, and nearby residents.

5. To what extent do you agree that expanding School Streets in Sandwell will:

	Strongly Agree	**Agree**	**Neither Agree nor Disagree**	**Disagree**	**Strongly Disagree**
Reduce Air Pollution	☐	☐	☐	☐	☐
Improve Road Safety	☐	☐	☐	☐	☐
Improve residents access to properties during drop-off and pick-up times	☐	☐	☐	☐	☐
Improve access for priority vehicles e.g. disabled, emergency vehicles	☐	☐	☐	☐	☐

5a. Do you have any further comments about School Streets?

No ☐
Yes ☐ please write comments in the box below:

Planning Active/Sustainable Travel

Active Travel refers to everyday journeys made by walking, wheeling, or cycling for a specific purpose, such as commuting to work or school. Sandwell Council would like to build on and create new partnerships with schools and businesses to help them develop travel plans that support sustainable commuting as a viable alternative to car use.

Active travel supports children's health, boosts concentration, reduces anxiety, and encourages lifelong healthy habits. For adults, it strengthens social ties and lowers the risk of chronic diseases - benefiting both individuals and communities.

6. To what extent do you agree that active and sustainable travel planning in Sandwell will:

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Reduce Air Pollution	☐	☐	☐	☐	☐
Improve Road Safety	☐	☐	☐	☐	☐
Improve physical health and wellbeing	☐	☐	☐	☐	☐
Improve mental health and wellbeing	☐	☐	☐	☐	☐
Create a healthier workforce	☐	☐	☐	☐	☐
Improve health and wellbeing of children	☐	☐	☐	☐	☐

6.a Do you have any further comments about active and sustainable travel planning in Sandwell?

No ☐

Yes ☐ please write your comments in the box below:

Speed Reductions (Traffic)

Lowering the speed limit on certain roads can help to reduce exhaust emissions from stop-start traffic and the release of particulate matter from tyre and brake wear. Whilst this measure cannot be used on all road, speed reductions from 30mph to 20mph are most likely to be suitable for use on roads by schools.

Speed reduction also brings additional benefits in terms of improving road safety, encouraging active travel and reducing carbon emissions.

7. To what extent do you agree that reducing the speed limit on some roads in Sandwell could:

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Reduce Air Pollution	☐	☐	☐	☐	☐
Reduce collisions and severity of collisions	☐	☐	☐	☐	☐

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
Reduce congestion – decrease overall journey times	☐	☐	☐	☐	☐
Be safer for vulnerable users e.g. children, elderly, disabled	☐	☐	☐	☐	☐
Reduce road traffic noise from engines and tyre/road interaction	☐	☐	☐	☐	☐
Promotes walking, scooting and cycling	☐	☐	☐	☐	☐
Reduce carbon emissions	☐	☐	☐	☐	☐
Improve health and wellbeing of children	☐	☐	☐	☐	☐
Improve road safety	☐	☐	☐	☐	☐

7a. Do you have any further comments about proposed road speed reductions in Sandwell?

No ☐
Yes ☐ please write your comments in the box below:

Additional Measures to Improve Air Quality

Below are a further four proposed air quality measures to be actioned over the next five years which are linked to schools. Further details of each of these measures can be found in Sandwell's draft Air Quality Action Plan.

8. To what extent do you agree with the following proposed measures?

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
5. The promotion of active travel (e.g. walking and cycling)	☐	☐	☐	☐	☐
6. Roll out of the Auntie Duck Children's Air Quality Education Programme to all primary schools in Sandwell	☐	☐	☒	☐	☐
7. Contribute to and promote an accredited air quality education scheme for primary and secondary schools which aligns with	☐	☐	☐	☐	☐

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
the national curriculum funded by the West Midlands Combined Authority					
20. Partnership working with NHS health professionals e.g. school nurses, asthma specialists	☐	☐	☐	☐	☐

8a. Do you have any further comments about these four proposed measures?

No ☐

Yes ☐ **please comment below:**

9. Are there any other actions that you think we should be doing to reduce local air pollution in Sandwell?

No ☐

Yes ☐ **please comment below:**

	Yes	No
10. Are you aware of any negative impact that the AQAP could have on residents or visitors to Sandwell?	☐	☐
11. Are you aware of any negative impact that the AQAP could have on Sandwell's businesses or economy?	☐	☐

Do you think this AQAP could discriminate against someone because of their:	**Yes**	**No**
Age	☐	☐
Religion or belief	☐	☐
Disability	☐	☐
Gender reassignment	☐	☐
Marriage or civil partnership	☐	☐
Pregnancy or maternity	☐	☐
Race	☐	☐
Sex	☐	☐
Sexual Orientation	☐	☐

Q.12 If you answered 'yes' to any of the above, please give details of why below:

Q.13 What lifestyle or behaviour changes would you be willing to make to reduce local air pollution? *Please tick all that apply*

☐	Walk my child/children to school
☐	Use a bicycle or walk for short local journeys
☐	Use bus, train, tram more instead of using own car
☐	Turn car engine off when stationary at traffic lights or parked
☐	Use a car club rather than purchasing/replacing my car (membership to club allows you to use on-street cars, where you pay to use a vehicle by the day or hour, without the responsibilities of car ownership).
☐	Car share with family, friends, colleagues to attend work, school, leisure activities
☐	Only burn dry, well-seasoned wood or smokeless fuel on your stove, open fire or barbeque
☐	Replace my gas boiler with alternative lower-emission technology e.g. air source heat pump, solar thermal panels, and solar panels
☐	Replace my wood burning stove with an alternative lower-emission heating appliance e.g. gas boiler, air source heat pump, solar thermal panels and solar panels
☐	Improve my understanding of air pollution by visiting the Council's or other relevant websites regularly
☐	Replace my current vehicle with an electric vehicle or other ultra-low emission alternatives
☐	Install an electric charging point at my property if possible
☐	Other

13a. If you ticked 'other' please specify below:

(NB. Identical questions re. age, etc to the general survey were then asked. They are not repeated here to save space)

Email Sent to Consultees

Dear Consultee,

Sandwell Council's Air Quality Team is currently updating the borough's **Air Quality Action Plan (AQAP**), and we would really like to hear from you. Whether you live, work, run a business, community group or organisation in the borough or just have an active interest in Sandwell, your insights matter.

This is your chance to help shape a healthier, more sustainable future for everyone in the borough. Your feedback will play a vital role in guiding our efforts to improve air quality and protect public health.

Air pollution is now recognised as one of the **most urgent environmental and public health challenges**, it significantly shortens life expectancy and affects individuals across all stages of life. Children are especially vulnerable, exposure to higher concentrations can result in impaired lung development, increased risk of asthma attacks, and reduced cognitive function. For adults, the consequences are equally serious, including higher risks of miscarriages and low birthweights, exacerbation of cardiovascular disease, respiratory conditions, dementia as well as worsening other chronic health conditions.

With the support and feedback from our AQAP Steering Group a draft plan has been produced which sets out how Sandwell Council will aim to improve local air quality in the borough between 2025 and 2030. We have 21 proposed actions, three of these have been identified as a being a priority to implement:

- School Streets
- Promoting Active/Sustainable Travel
- Road speed reductions

These priority actions reflect the need to protect the health of children and young people within our borough, as well as supporting sustainable travel choices for everyone, and encouraging active travel e.g. walking and cycling. The overall aim of the plan is to create a cleaner, healthier, and more sustainable borough that benefits us all.

The draft AQAP consultation runs until **21 September 2025**. You can view the plan, and take part in the survey (it takes about 10 minutes) via this link: **https://consultationhub.sandwell.gov.uk/public-health/draft_aqap/**

Please feel free to encourage others to complete this survey by sharing with your networks.

If you have any questions, comments or would like to discuss the draft further, please email pollution_control@sandwell.gov.uk.

APPENDIX B – Statutory Consultee Responses

The Secretary of State (Defra) –Appraisal Commentary

1. A map showing the extent of the AQMA should be included in the main body of the report to provide context of the AQMAs location.
2. Further details on monitored NO_2 concentrations over the past five years and the relevant distance corrected values should be included in the final AQAP. This allows for clarity, on the exact number of years of compliance. Data should also be presented up to 2024 in line with the 2025 ASR.
3. Detailed information regarding the public health context has been provided which includes comparison with national figures regarding data from the Public Health Outcomes Framework, the number of hospital admissions due to asthma, and Indices of Multiple Deprivation (IMD).
4. A source apportionment exercise has been undertaken at worst case diffusion tube site BP using the EFT, in line with LAQM.TG(22). Local traffic data was obtained from an Automatic Number Plate Recognition (ANPR) survey. The ANPR-derived fleet was compared to the default EFT fleet, which showed a larger proportion of older cars, LGVs and rigid HGVs in use in Sandwell, likely reflecting the relatively deprived population within Sandwell. The source apportionment considers regional and local background, vehicle split, as well as industrial, domestic and other transport sources.
5. No required reduction in emissions has been calculated as the AQMA is currently in compliance with the AQO, and therefore the required reduction is zero. Instead, a future baselining exercise has been undertaken for site BP, using several methodologies, in order to assess potential future air quality level over the lifetime of the AQAP.
6. There is currently no information on stakeholder engagement at this stage. It is stated that the list of stakeholders and methods taken to engage them will be provided. This should all be completed when publishing the final AQAP.
7. A steering group has been established in February 2025 which includes internal Council officers, as well as external members from West Midlands Combined Authority, Transport for West Midlands, Black Country Transport, National Highways, LiviNG Streets, British Cycling, the NHS and AECOM as external consultants. The AQAP states that steering group meetings will be held every 6 months to report on progress and drive the delivery of actions.
8. The impact of measure 2 (speed reduction on Birmingham Road from 40 to 30mph) was evaluated using standard air quality modelling, which showed an increase in NO_X emissions. A local study within Sandwell for a similar proposed reduction in speed limit on All Saints Way using microsimulation modelling was consulted for comparison. This study showed a reduction of 13% of NO_X emissions. Microsimulation modelling takes more accurately into account individual speed and acceleration behaviours, than standard air quality modelling. It would be beneficial to replicate a similar study on Birmingham Road to confirm that a speed reduction would not lead to increased emissions, due to local factors.

9. Measures which are not being progressed, and the reasons why have been included in Appendix
10. Defra recommends that Directors of Public Health approve AQAPs. Sign off is not a requirement, however collaboration and consultation with those who have responsibility for Public Health is expected to increase support for measures to improve air quality, with co-benefits for all. Please bear this in mind for the submission of your final AQAP and future iterations.

The Environment Agency

Dear Elizabeth,

I am writing in response to your general enquiry, received 12 August 2025 regarding consultation survey regarding Sandwell Council's draft Air Quality Action Plan.

Our Air Quality team comment as follows:

We are not able to provide detailed comments on every Air Quality Action Plan we receive so we have compiled a summary of the issues/priorities that we feel are common to each air quality action plan and where possible/appropriate, we have made council specific comments.

General

Air quality has a significant role to play in the health and wellbeing of communities and the prospects of the natural environment, reducing both life expectancy and biodiversity in heavily polluted areas, and otherwise impacting upon the perception of the quality of life and amenity offered by the area. For example, reports suggest that there over 40,000 brought forward deaths per year in the UK due to air pollution and costs to the UK economy of up to £13 billion per year.

The Environment Agency - our role in Air Quality

We have a number of duties related to air quality;

1. We ensure that the industrial facilities we regulate comply with the Environmental Permitting (England and Wales) Regulations 2016, thus contributing to compliance with:

· UK requirements such as the UK Air Quality Strategy, the Countryside and Rights of Way Act and the Natural Environment and Rural Communities Act; and

· EU requirements on the UK such as Air Quality Directives, Habitats Directive, the National Emissions Ceiling Directive and the Industrial Emissions Directive.

2. We support local authorities in improving local air quality, particularly through providing technical guidance on behalf of Defra to local authorities in respect of industrial facilities they regulate.

3. We coordinate ambient air quality monitoring for incidents that may have a significant impact on air quality.

4. We were not generally responsible for assessing or monitoring ambient air quality until April 2016 when we took on the contract management of the latter in the form of the ten monitoring networks that were formally managed by Defra.

The Environment Agency is committed to working with local authorities and to play our part fully in Local Air Quality Management (LAQM). We have found that several sectors we regulate under the Environmental Permitting Regulations have the potential to affect air quality negatively. Nationally some individual installations in these sectors have already been found to contribute significantly and we have been working with the affected local authorities for some time to implement the necessary improvements. Installations we regulate may be covered by freestanding Air Quality Action Plans or ones, which are transport-related and incorporated into Local Transport Plans.

We suggest that any new air quality action plan adheres to the principles in the London Plan and Air Quality policy SI 1, including air quality neutrality and air quality positive, as well as the relevant SPD's. The plan must also help to bring local air quality below EU limit values for local pollutants- in particular PM10, PM2.5 and NO2, as expressed in the EU Air Quality Directive and implemented in the UK through the 2010 Air Quality Regulations or subsequent revisions.

The Agency as an Air Quality Partner

The Environment Act 2021 established a formal role of Air Quality Partners into the Local Air Quality Management framework. As an Air Quality Partner, the Environment Agency can assist local authorities with reasonable requests, if a source of pollution from an Environment Agency permitted site which is responsible for significantly contributing to failures of air quality standards. For example, by providing information on a source of air pollution.

We always work to minimise emissions from all sectors of regulated industry, and we already work closely with most local authorities on local air quality matters. It is possible to declare the Environment Agency as an Air Quality Partner, however, we expect this to only be necessary where (1) one or more of our regulated sites are "significantly contributing to exceedances of local air quality standards" (2) there is a legal pathway available to us to deliver improvements and (3) we have not responded to requests to work in partnership with a local authority via our business as usual approach. Please contact us (and cc in air.quality@environment-agency.gov.uk) as early in the process as possible if you consider it necessary to nominate us as an Air Quality Partner. We will provide any reasonable assistance in connection with requests.

Preferred Position for Air Quality Action Plans -

In principle any Air Quality Action Plan should;

1. Have a clear commitment to meeting the relevant air quality standards;
2. Clearly state the status of air quality within the council's area;
3. Clearly report on the progress against targets set out in any previously published Air Quality Action Plan (if appropriate);
4. Where the council does not meet the relevant air quality standards, they should clearly detail what mitigation measures will be used to ensure compliance with air quality standards in the shortest possible time. It should ensure that compliance is not just 'possible' but 'likely';
5. Make clear what other organisations the council's working with/planning to work with to implement improvement measures (as in 2 above), and what they are agreeing to deliver;
6. Include basic costs required to implement the required mitigation standards and compare against the level of funding available;
7. Even though you are not a London based borough, we would urge you to take steps to deliver the measures in the Mayor of London's SPDs on sustainable design and construction or any update thereof to an equal or higher standard are implemented into the air quality action plan; In particular, this should include;
    1. Require all new buildings be constructed and designed in a manner that minimises emissions of pollutants to the air both during construction and demolition and post-construction, making new development 'air quality neutral' or better;
    2. In the case of a major development, include an air quality assessment (as set out in the Mayor of London's SPDs on sustainable design and construction, or update thereof, to an equal or higher standard) that considers the potential impacts of pollution from the major development and on neighbouring areas during construction and operation, including development related traffic and the potential for exposure to pollution levels above;
    3. Implement any policies on transport which pertain to improving air quality;
    4. Require any waste transfer stations to be in a building, enclosed on all vertical sites with small access and egress points covered by doors which default closed when not in use and an air extraction and filtration system to collect particulates as per London Plan Policy SI 8 E4;
    5. Require all industrial sites that use non road going mobile machinery to meet the latest NRMM standards on the date of purchase, or hire;
    6. Contribute to achieving EU established health-based standards and objectives for the relevant air pollutants (particularly NO2, PM10, and PM2.5);
    7. Refer to and take account of, where necessary, Defra's Interim Planning Guidance on the consideration of the Environment Act PM $_{2.5}$ targets in planning decisions https://uk-air.defra.gov.uk/pm25targets/planning

Traffic -

Where there is a significant incidence of poor air quality within and adjacent to the area of concern (and in most cases this is directly attributable to emissions from road traffic) air quality policies must work in partnership with transport policies but also the authorities' own fleet procurement policies, and partner authorities/ organisations.

New Developments -

Any new development, particularly in air quality 'hotspots' or development 'Opportunity areas', will need to consider how they mitigate the impacts of poor air quality. During construction the main air quality effects from development are anticipated to result from emissions of oxides of nitrogen (NOx) and fine particulate matter and dust (PM10 and PM2.5) emanating from an increase in road traffic, construction and from traffic management schemes.

Major developments planned within the council's area will need to significantly mitigate their emissions and thus contribute towards improving local air quality as per the requirements of Air Quality Neutral and Air Quality Positive. This is particularly the case where they include potentially new sources of emissions such as biomass boilers, data centres, diesel array power generation, combined heat and power plants, and increased traffic-generated emissions. The effects on air quality during construction will also need to be managed, both in terms of emissions that generated from traffic, and from the treatment and processing of material from demolition and excavation.

Construction and demolition works should be required to meet or exceed the requirements set out in the Institute of Air Quality Management's Guidance on the 'Assessment of Dust from Demolition and Construction'.

We are also aware that Air Quality Neutral, Air Quality Positive and 'Agent of Change' policies can affect existing industrial sites we regulate where they are within or adjacent to new development. In these cases, we encourage early contact with our relevant officers.

Non-Road Mobile Machinery -

Where a commercial or industrial site involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during construction, and/ or operation, and/ or demolition at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority. We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection.

Waste Management Sites -

Waste management sites are a potential source of fugitive particulate emissions to air if not managed correctly. Those sites which mitigate the potential effects of air pollution by enclosing processes within buildings tend to be far less polluting and enclosure is now recognised as best practice for such sites. Consequently, we encourage any new Air Quality Management Area declaration, Air Quality Action Plan and/or proposed Clean Air Zones to require the further enclosure of existing waste handling sites and expect future waste development to be fully enclosed within buildings to minimise health impacts, improve amenity, and contribute towards improving air quality.

Data Centres

This is a rapidly growing industry sector with specific environmental and regulatory challenges for the Environment Agency and Local Authorities. Data centres provide security and reliability in storing digital data on servers with back-up diesel powered power supply in the event of grid failure. They are often critical to national and local infrastructure systems, financial institutions and other large commercial interests. They are often housed in large buildings, sometimes in clusters in urban areas, and may have low or horizontal stacks that are not optimised for dispersion of emissions.

Many are also located in Air Quality Management Areas. Depending upon the size of the diesel stand by generation on site, the Environment Agency usually requires the operator to hold an Environmental Permit. When operating their standby generators during a power outage or testing, they will release emissions of NO_2, PM_{10} and $PM_{2.5}$.

In the event of a power outage (planned or otherwise) short term emissions could be considerable, especially where several are co-located data centres. They can also present other significant environmental impacts outside of the Environment Agency's regulatory remit. These are often controlled through planning conditions, but care must be taken to ensure there isn't an overlap in regulatory controls.

Both the Agency and several Local Authorities have found that there are considerable advantages in early liaison and coordination of the planning and permitting controls for these sites. Therefore, we would encourage Local Authorities that have data centres or become aware of potential new data centres to liaise closely with the Environment Agency from an early stage.

Regional Approach to Local Air Quality -

It is recognised that Sandwell Council will need to work with others on the implementation of the measures necessary to address poor air quality as the matter is often not confined to one planning authority area, and development is often governed by separate regulatory regimes and legislation, such as building regulations and environmental permitting.

Yours sincerely,

[redacted]

WMD Area Customers and Engagement Team

UKHSA (United Kingdom Health Security Agency)

Dear Liz/Sandwell Metropolitan Borough Council,

Thank you for sending though your consultation request regarding your Draft Air Quality Action Plan (AQAP). I have looked at your website and Sandwell MBC's Draft Air Quality Action Plan 2025 2030.

Overall, the document addresses the areas of concern for air quality and health that we would expect to see in an AQAP. I have listed my comments below.

In terms of public health context:

- The Sandwell Metropolitan Borough Council AQAP focuses on the two main health-critical pollutants, NO_2 and $PM_{2.5}$. This includes trend analysis, and a key priority for PM reduction.
- Though adhering the UK national legal limits, Sandwell Metropolitan Borough Council acknowledges that it is "widely recognised that there is no safe level of particulate pollution and health impacts are expected even below these value", but there is no inclusion of a long-term commitment or target to reduce these pollutants further, such as alignment with the latest WHO Global Air Quality Guidelines. Some air pollutants, such as nitrogen dioxide (NO_2) and particulate matter (PM), are non-threshold, i.e., there is no known level of exposure below which health impacts don't occur. This means that any improvement in air quality, even below Air Quality Objectives and Standards, is associated with benefits to people's health.
- The strategy focuses on environmental outputs (monitoring and enforcement) as measurable outcomes. We recommend incorporating measurable public health outcomes into the plan, such as modelled estimates of reduction in estimated years of life lost (YLL) or avoided hospital admissions.
- The council acknowledge the PM risk from domestic burning such as solid fuel and log burners and is raising awareness of their contribution to local air pollution. The council has an excellent webpage on wood burning stoves and other solid fuel burners.
- OPERATIONAL ISSUE: The link provided for the Council's Air Quality Dashboard (https://portal.earthsense.co.uk/SandwellPublic) is currently non-functional. Given the value of this tool for public health alerts, it is vital that this is rectified.
- For air quality and locations near schools, the website does mention idling cars and the contribution to pollution. The council may wish to consider some strategy to commit to anti-idling using signage and raising greater public awareness or even enforcement for prolonged idling offences.
- It is positive to see there is a cross-reference with the local Joint Strategic Needs Assessment and Health and Wellbeing Strategy.
- The public health case would be strengthened by systematically integrating and discussing relevant Office for Health Improvement & Disparities (OHID) Fingertips data to evidence and target local action. Key air quality indicators at the local authority level include: 1) Fraction of mortality attributable to particulate air pollution, 2) Air pollution: fine particulate matter, and 3) Proportion of population living within AQMAs (%). Other potentially relevant indicators address physical activity, inequalities, and wider determinants of health.
- The evidence around the role of fine and ultrafine fractions in the health effects of air pollution is growing. In 2021 the World Health Organization reduced their guideline level for fine PM ($PM_{2.5}$) from 10 $\mu g/m^3$ to 5 $\mu g/m^3$. Further information from the

Department for Environment, Food and Rural Affairs (Defra's) on England's fine particulate matter targets is available on UK Air

UKHSA supports approaches which minimise or mitigate public exposure to non-threshold air pollutants, address health inequalities (in exposure) and maximise co-benefits (such as by increasing active travel and physical exercise or improving access to and quality of greenspaces). When considering local actions, you may wish to:

- Embed equity: Consider the spatial distribution of pollutant concentrations and local health profiles and address areas with high concentrations and poor existing health
- Prioritise proven interventions: Consider the hierarchy from the 2019 PHE interventions report when selecting actions and prioritise proven interventions with co-benefits
- Systematic evaluation: Embed evaluation in the design of interventions from their outset and systematically gather evidence of their impact and effectiveness

UKHSA supports awareness raising measures, including alerting and campaigns providing information and advice to businesses and the public. The AQAP outlines related actions, within which the council may wish to address how people can both minimise their *contribution* to air pollution and also their *exposure* to air pollution. The council may also wish to consider the final report and recommendations of Defra's recent Air Quality Information System Review to inform its local initiatives.

I hope that these comments are useful to your development of the AQAP.

[redacted]

Environmental Public Health Scientist

Environmental Hazards and Emergencies

APPENDIX C – Non-Statutory Consultee Responses

Mums for Lungs

Dear Sandwell Council,

We welcome the opportunity to comment on your draft Air Quality Action Plan 2025–2030 and commend the Council for taking steps to tackle this critical public health issue. As a parent-led campaign group focused on protecting children from the harmful effects of air pollution, we are pleased to see many positive elements in the plan.

In the draft AQAP we are particularly pleased to see

- The clear recognition that young children and vulnerable groups are disproportionately affected by air pollution.
- The focus on air quality around children and schools
- Top priority being the implementation of School Streets
- The priority given to supporting active travel to support the decrease in car use
- The recognition of the harms of domestic woodburning and the need for both awareness raising campaigns and enforcement
- The integration of public engagement and behavioural change campaigns to encourage low-pollution lifestyles, and particularly the focus on schools and young people, and the development of high-quality resources.

These are important steps and show commitment to change. However, to really be effective we believe the plan could be strengthened in several key areas.

- In the background information and monitoring of air quality we would always support reference to the WHO interim air quality targets rather than the woefully outdated UK legal limits.
- While we commend some of the aspirations there could be more specific measurable targets, both for the 5 year period and for milestone periods so that both the Council and the public can track progress in an effective and accountable way. For example a commitment to a percentage of primary schools to have a school street after 2 years, 3 years and at 5 years would be a great and obvious improvement.
- In recognition of the challenges of enforcement on domestic wood burning we would like to see also a commitment to lobbying central Government, individually and alongside other local authorities.
- We see from the full consideration of options that with the rejection of a Clean Air Zone there is no action addressing the disproportionately polluting impacts of diesel vehicles. Aside from the CAZ this could have included diesel surcharging for parking. We realise that this is unlikely to change at this stage but do think that this is a missed opportunity that could be added if the plan is reviewed during its lifespan.

[redacted]

On behalf of Mums for Lungs

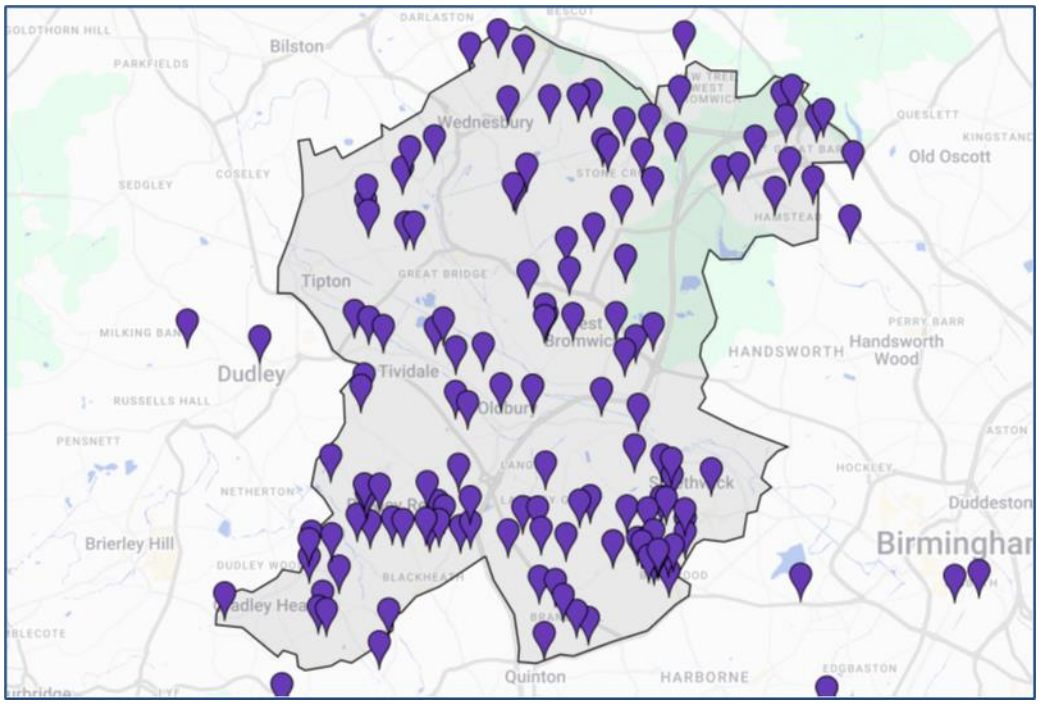
APPENDIX D - Consultation Survey Results

General Survey Results

1. Geographical distribution of respondents

Participants were asked to provide their postcode to help understand how responses were distributed across different areas.

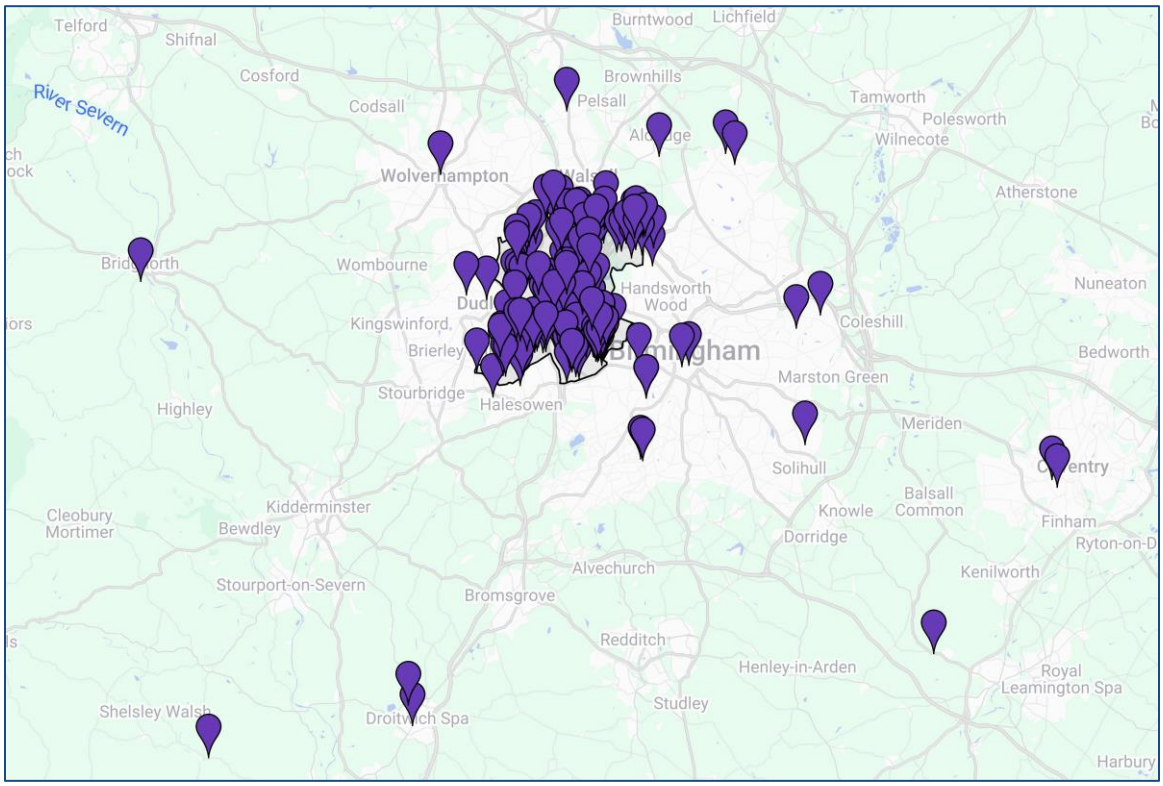
1.1 – Map of Sandwell Respondents



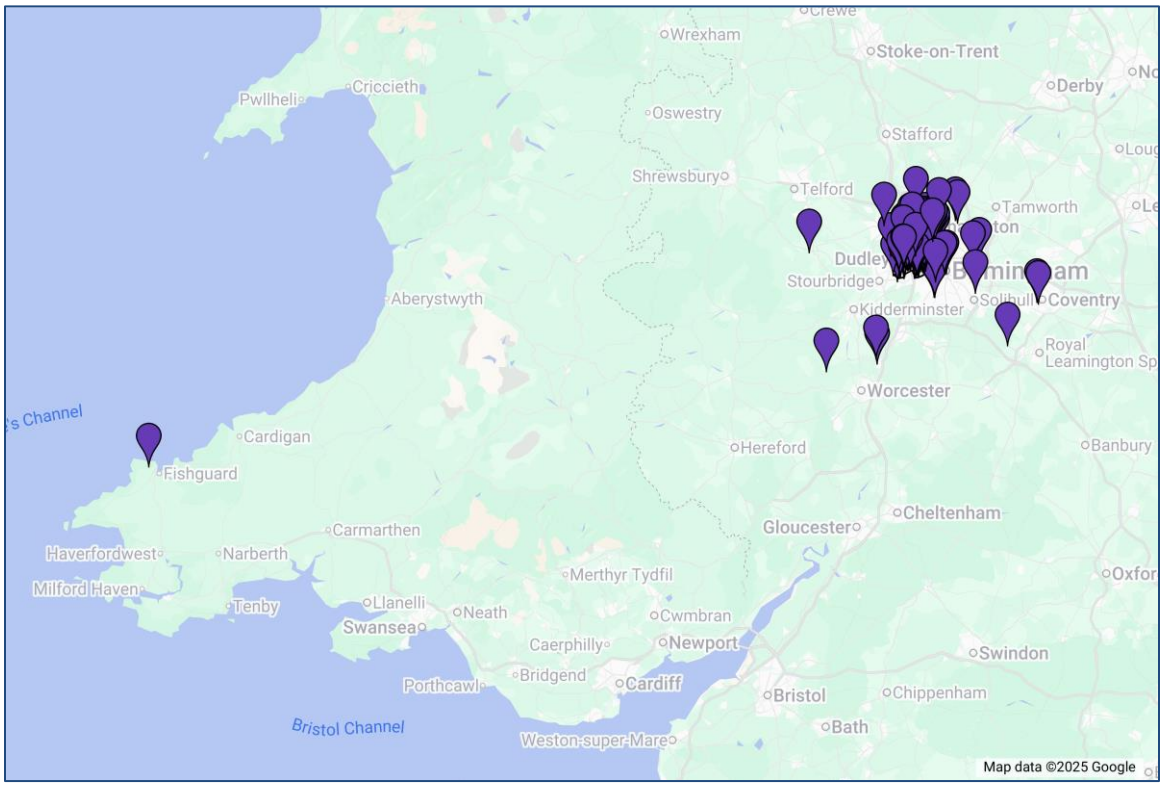
The map demonstrates **wide coverage across Sandwell**, with respondents fairly well-distributed across key towns including Oldbury, Tipton, Wednesbury, and West Bromwich, suggesting broad engagement across the borough. Although there's a noticeable concentration of responses around more densely populated areas like West Bromwich and Oldbury,

Responses to Sandwell's Draft Air Quality Action Plan (AQAP) consultation were not limited to Sandwell residents, **Map 1.2 and Map 1.3** demonstrates some engagement from neighbouring areas such as Worcester, Coventry, and Royal Leamington Spa. A small number of responses came from much further afield, including southwest Wales. This pattern suggests that interest extends beyond local boundaries, likely reflecting the concerns of commuters, regional stakeholders, and individuals with broader environmental interests.

1.2– Map of Respondents within the Midlands

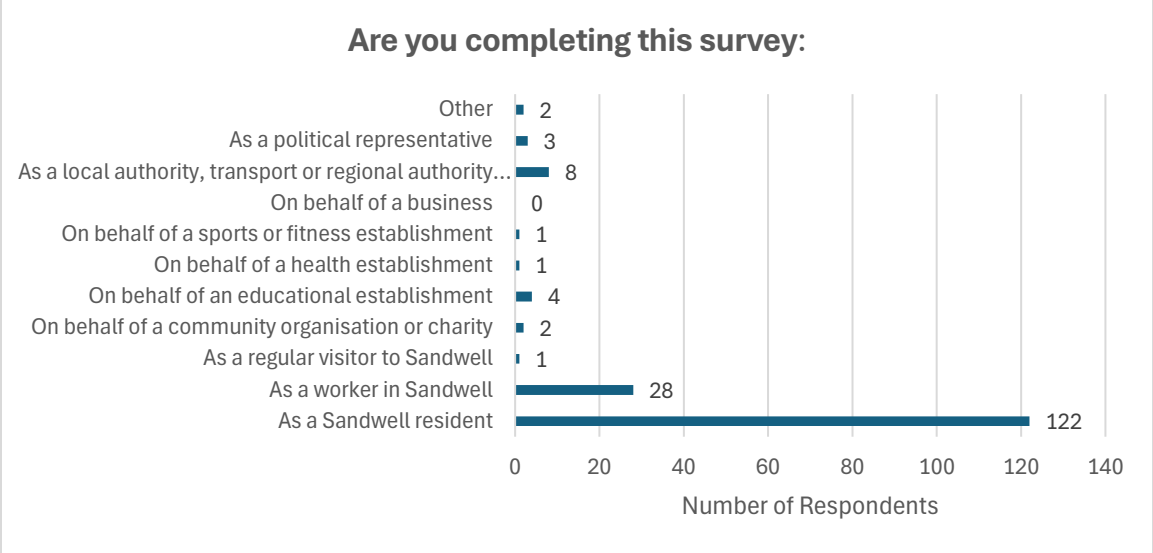


1.3 – Map of Respondents in England



2. Reason for Participation in the Survey

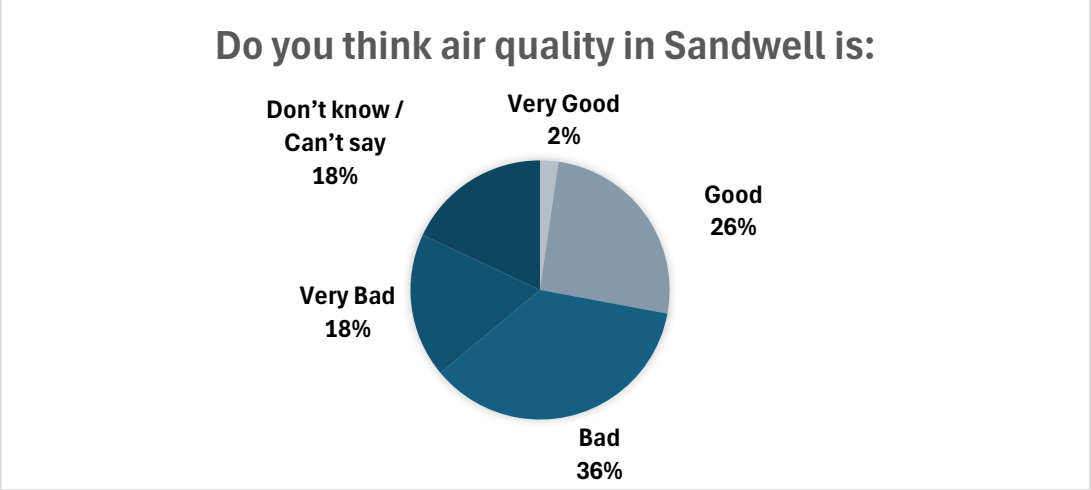
Q1 - Are you completing this survey:



3. Local Air Quality

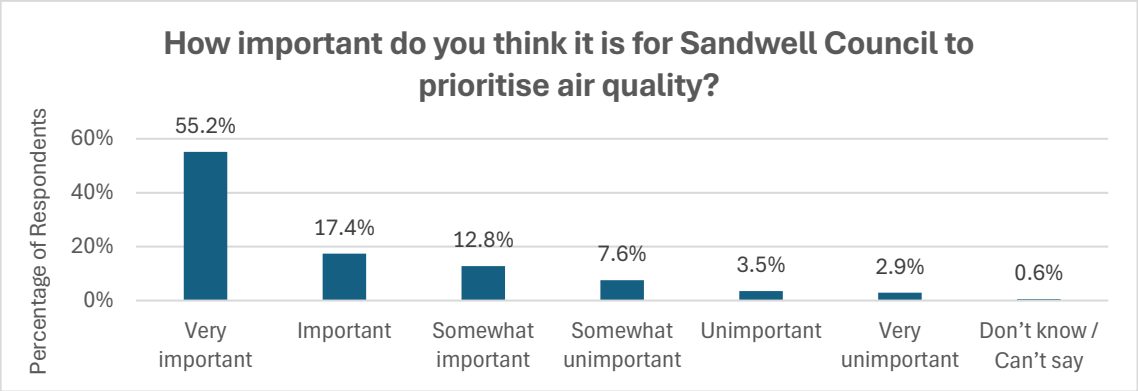
Please note responses were categorised into themes, with some responses including more than one theme; as a result, totals may exceed 100% in the following bar charts.

Q2 - Do you think air quality in Sandwell is:



Most respondents view air quality in Sandwell negatively: 54% think it is either 'bad' or 'very bad'. Whilst only 28% consider it 'good' or 'very good'.

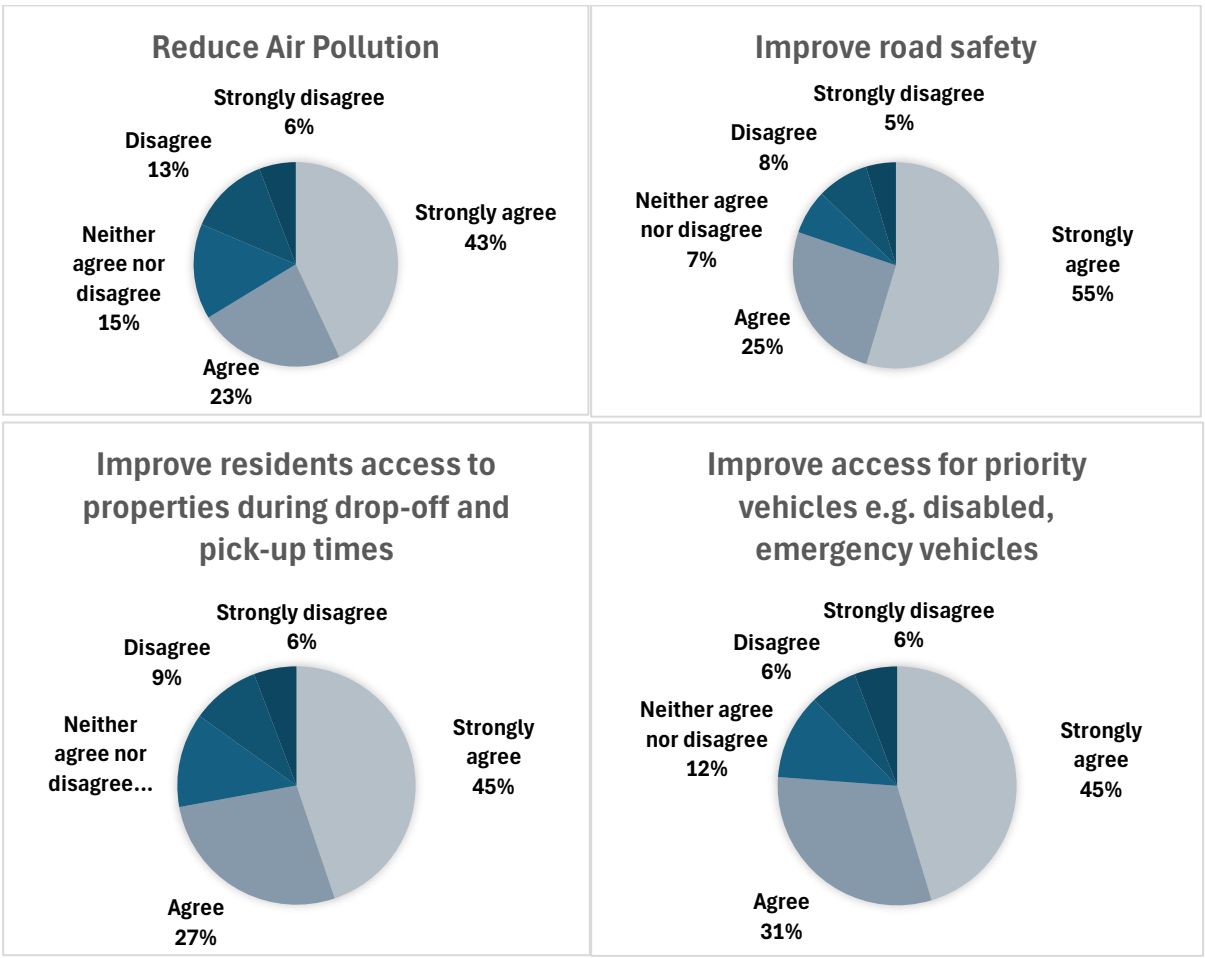
Q3 - How important do you think it is for Sandwell Council to prioritise air quality?



The bar graph shows that a clear majority of respondents, **72.6 %, believe it is either 'very important' or 'important'** for Sandwell Council to prioritise air quality. Only 12.4% deemed it as either 'somewhat unimportant', unimportant' or 'very unimportant'.

4. School Streets

Q4 - To what extent do you agree that introducing more School Streets into Sandwell will:



Most respondents agreed that introducing more School Streets in Sandwell would deliver positive outcomes. Road safety was seen as the biggest benefit, with 80% either strongly agreeing or agreeing. Reducing air pollution also scored highly, with 66% either strongly agreeing or agreeing. Views on improving access for residents during drop-off and pick-up times and priority vehicle access were slightly less strong but still positive, with 70% strongly agreeing or agreeing. Disagreement levels were low across all areas, and only a small proportion neither agreed nor disagreed.

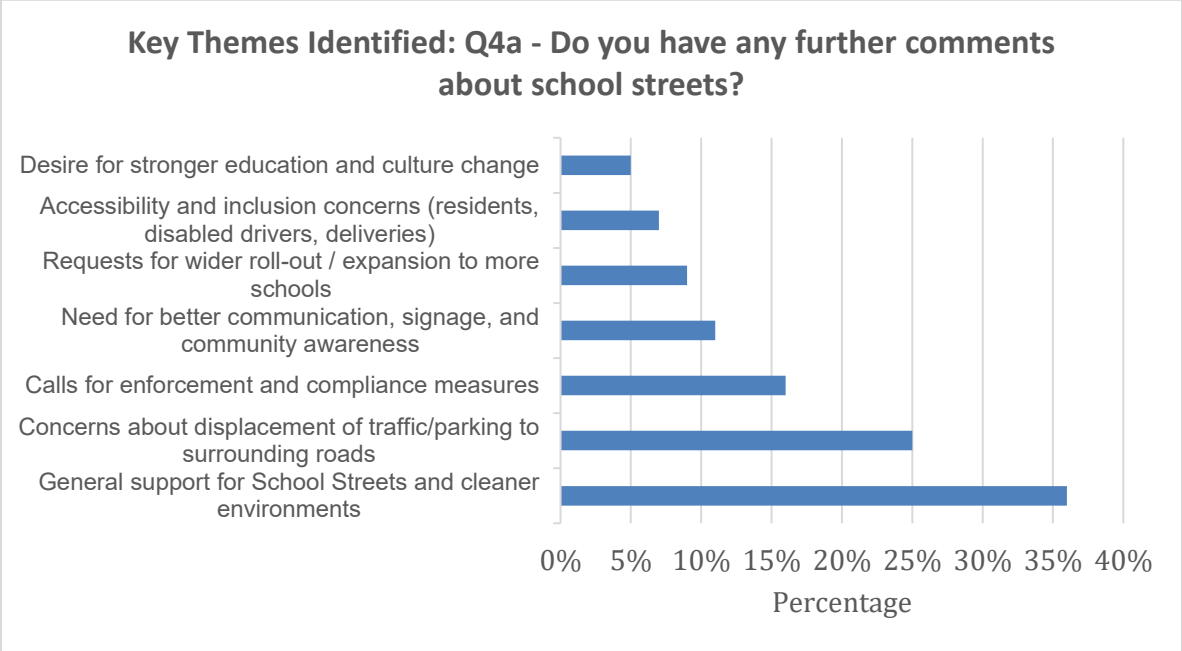
Q4a – "Do you have any further comments about School Streets?"

Number of comments: 55

Summary of Feedback

Most participants expressed strong support for the concept of School Streets, citing benefits to air quality, road safety, and children's health.

However, respondents also raised concerns about displacement, enforcement, and practicality, particularly regarding parking and traffic in nearby streets.



Quotes:

"*There should be more of them - great idea that helps everyone."*

"It's good in theory but just moves the problem onto other nearby streets."

"People sit for long periods with their engines on outside schools, this needs proper enforcement."

"Residents still need access - clear communication and planning are essential."

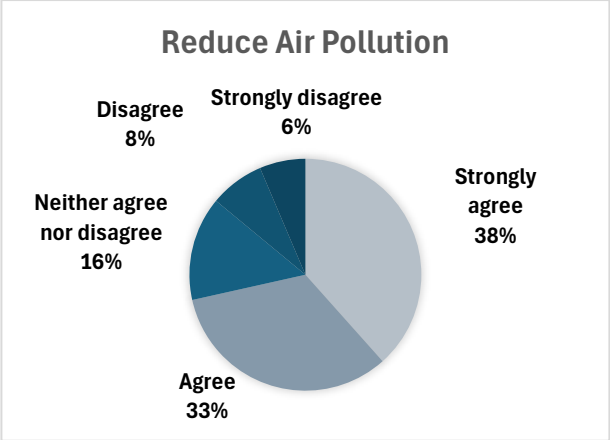
"*School Streets are a good start but should be part of wider education and sustainable travel efforts."*

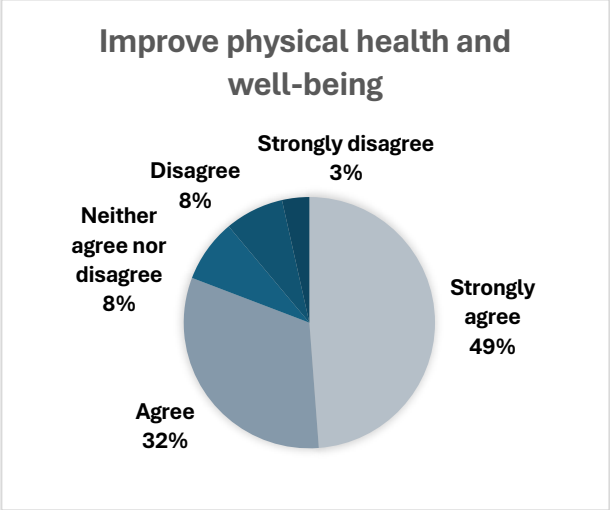
Key Takeaways

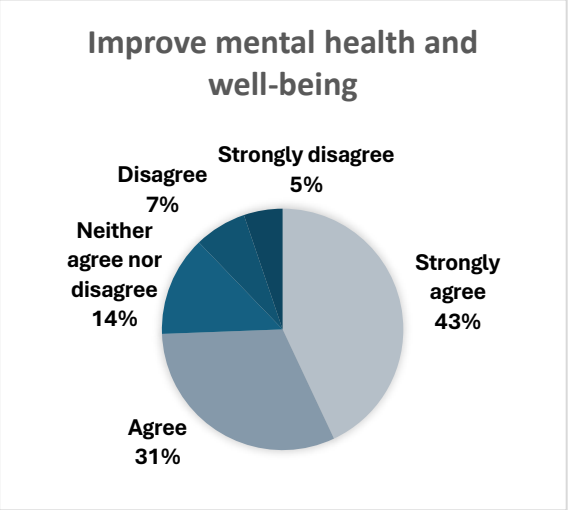
- **Broad support:** Respondents largely welcome School Streets as an effective way to cut pollution and improve safety.
- **Implementation challenges**: Concerns persist about displacement and practical enforcement.
- **Community buy-in**: Success depends on clear communication, signage, and engagement with residents.
- **Scalability**: Many wish to see School Streets expanded borough wide as part of a sustained behaviour change effort.

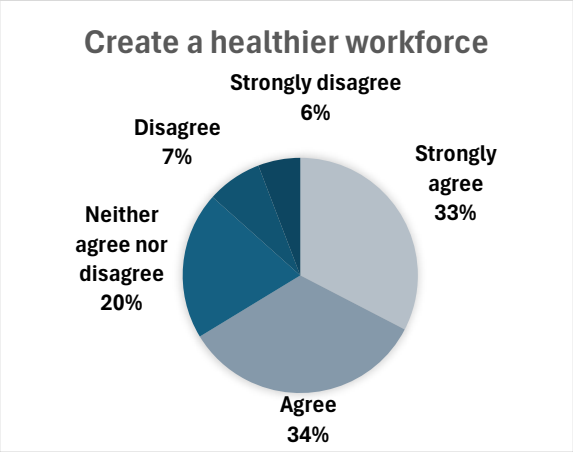
5. Active and Sustainable Travel Planning

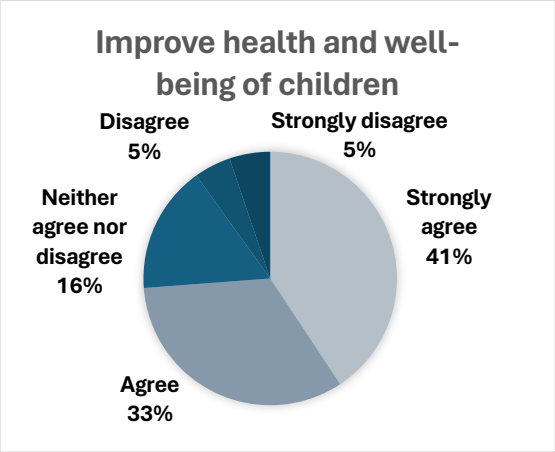
To what extent do you agree that active and sustainable travel planning in Sandwell will:











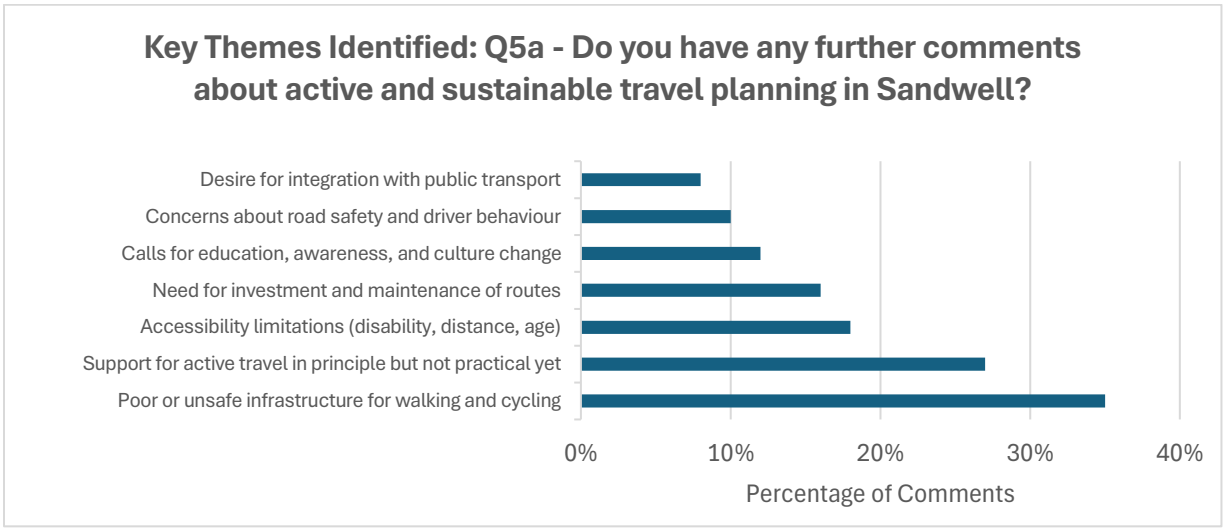
Most respondents agree that active and sustainable travel planning in Sandwell will deliver significant benefits. Strong agreement is highest for improving physical health and well-being (49%) and mental health and well-being (43%), followed by reducing air pollution (38%) and improving children's health (41%). Support is also strong for improving road safety (30%) and creating a healthier workforce (33%). Overall, positive responses far outweigh disagreement, with only small percentages expressing neutral or negative views.

Q5a "Do you have any further comments about active and sustainable travel planning in Sandwell?"

Number of comments: 51

Summary of Feedback

While many supported active and sustainable travel, most felt current infrastructure, safety, and accessibility were inadequate. Respondents called for better cycle routes, safer roads, improved public transport, and workplace/school facilities. Personal factors like disability, age, and travel distance also limited participation.



Quotes

"*Active travel can only succeed if it is a viable option, right now, the infrastructure just isn't there.*"

"Roads, cycle lanes and walking routes don't currently encourage people to adopt active travel. Safety and confidence are major issues."

"Not everyone can walk or cycle, we need realistic alternatives for older and disabled people."

"Public transport and cycling infrastructure should work hand-in-hand, one without the other doesn't solve the problem."

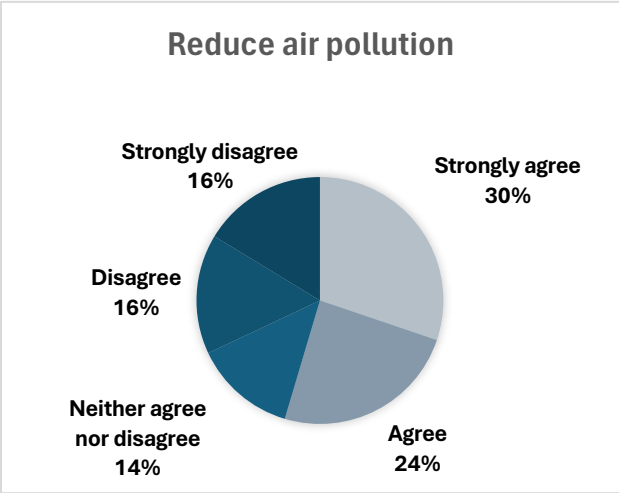
"If Sandwell wants people to travel differently, it needs to invest long-term, not just run short campaigns."

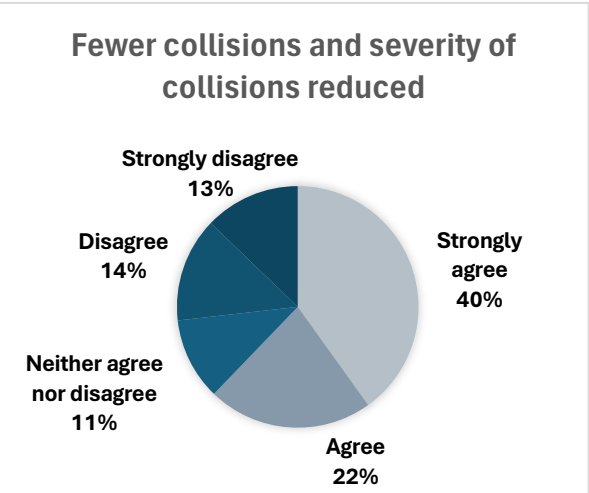
Key Takeaways

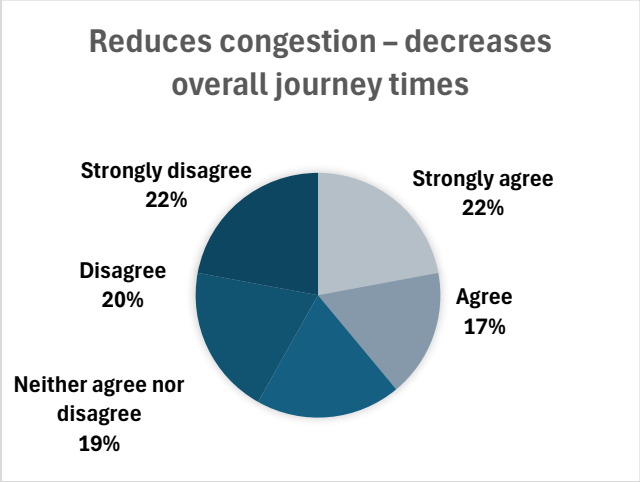
- Infrastructure gaps are the biggest barrier - unsafe or incomplete walking and cycling routes prevent widespread uptake.
- Positive intent exists, but residents see a disconnect between policy ambition and on-the-ground delivery.
- Accessibility and inclusivity are key - respondents emphasised that active travel isn't feasible for everyone.
- Cultural change and education will be needed alongside physical improvements.

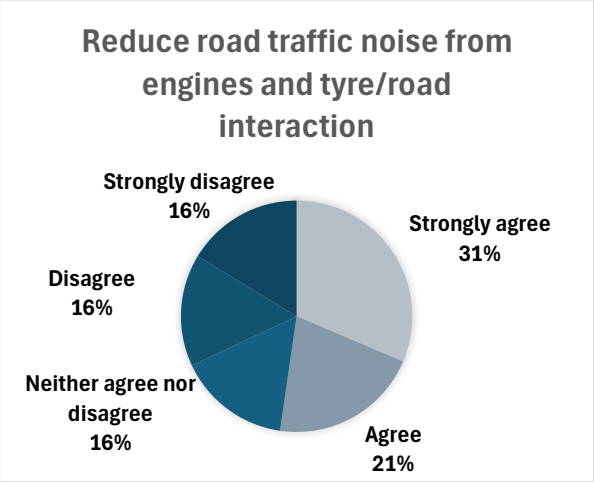
6. Reducing the Speed Limit on Some Roads in Sandwell

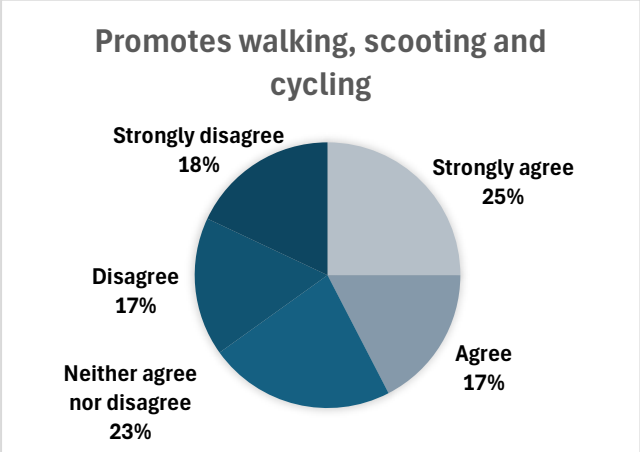
Q.6 To what extent do you agree that reducing the speed limit on some roads in Sandwell will:

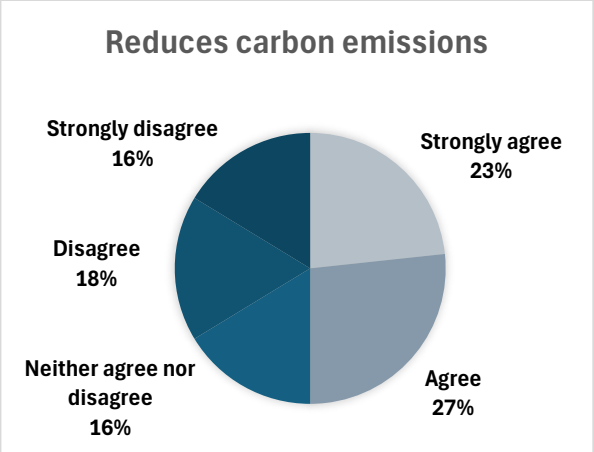












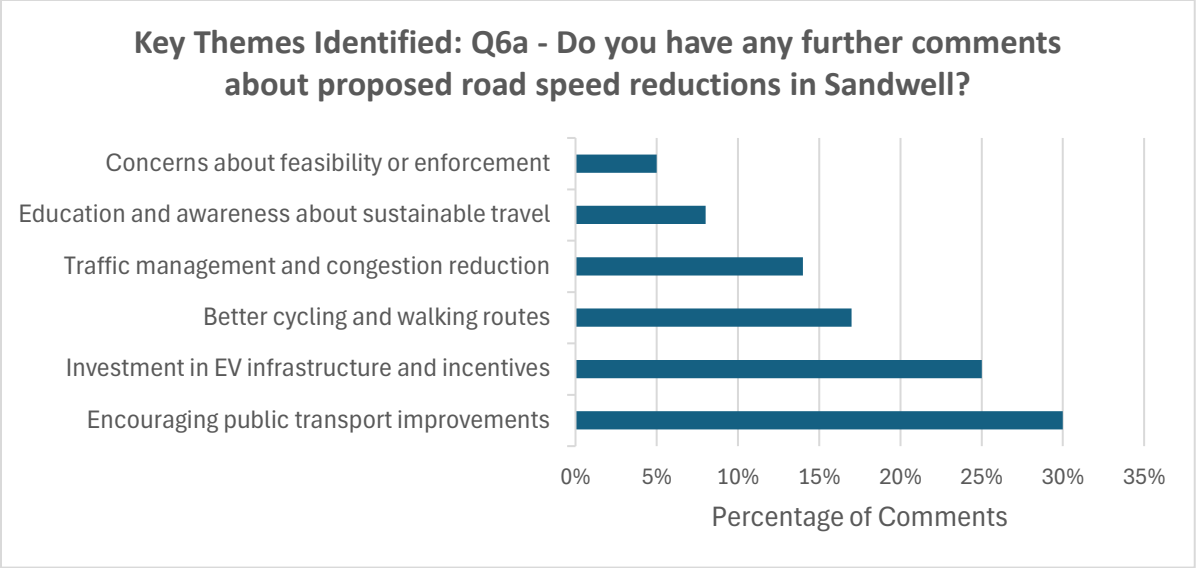
Respondents generally agree that active and sustainable travel planning will deliver multiple benefits, with the strongest support for reducing collisions (62% strongly agree or agree) and cutting road traffic noise (52% strongly agree or agree). While reducing air pollution received good support with 54% strongly agreeing or agreeing, and 50% agreeing or strongly agreeing that carbon emissions would be reduced. Responses around congestion and journey times were more mixed, showing the lowest levels of agreement at 39% and 42% disagreeing.

Q6a – "Do you have any further comments about proposed road speed limit reductions in Sandwell??"

Number of comments: 59

Summary of Feedback

Respondents broadly supported actions to reduce transport emissions, with clear emphasis on public transport, electric vehicle (EV) infrastructure, and active travel. While most comments were positive, several noted barriers such as affordability, feasibility, and behavioural change challenges. Many participants highlighted the need for systemic investment rather than relying solely on individual responsibility.



Quotes

"Reliable, affordable buses and trains are key, people won't switch if it's not convenient."

"There aren't enough EV chargers, especially in residential areas without driveways."

"Cycling infrastructure must be safer and connected; current lanes are fragmented."

"Reducing idling and managing traffic better would have an immediate effect."

"Education campaigns could help people understand the wider benefits of reducing emissions."

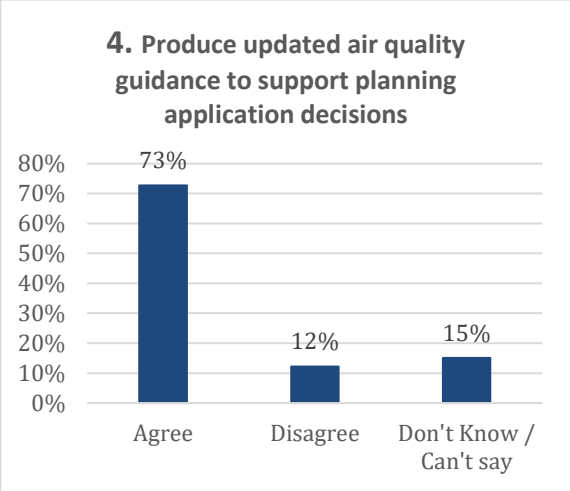
"These ideas sound great, but enforcement and funding will be the real challenge."

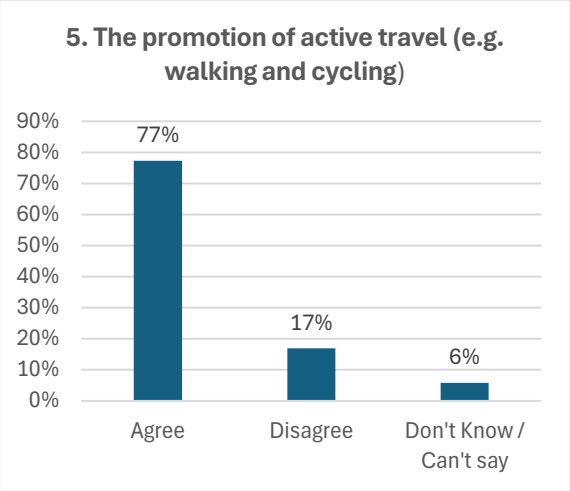
Key Takeaways

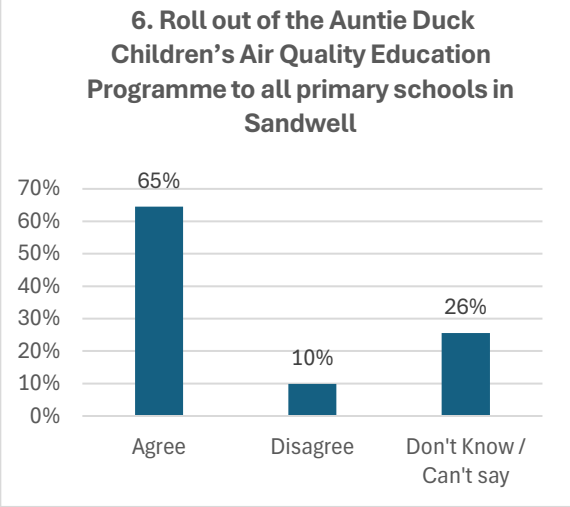
- The responses indicate strong community backing for a multi-faceted approach that combines infrastructure, incentives, and education
- There is notable enthusiasm for public and active transport improvements, balanced with a pragmatic view that infrastructure gaps and cost barriers must be addressed to drive real change
- Positive feedback was expressed toward measures that make sustainable options more convenient and visible, while concerns centered on the cost of EV transition and the perceived slow pace of implementation.

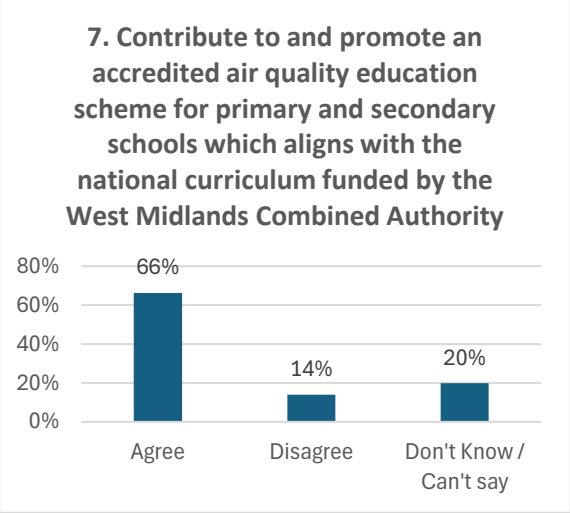
7. Additional Measures Proposed in the Draft AQAP

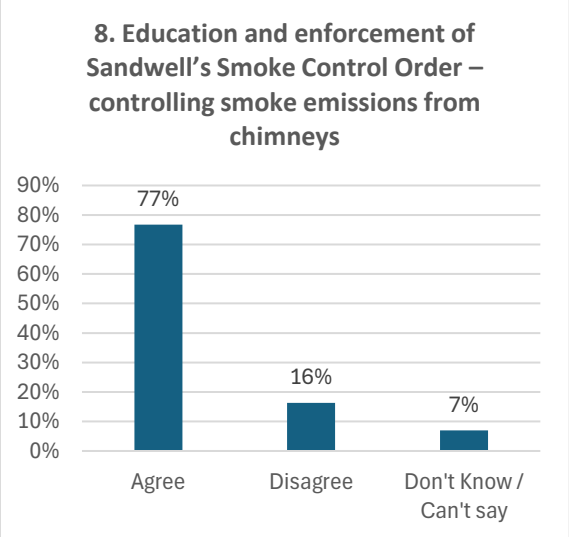
Q7. To what extent do you agree with the following proposed measures

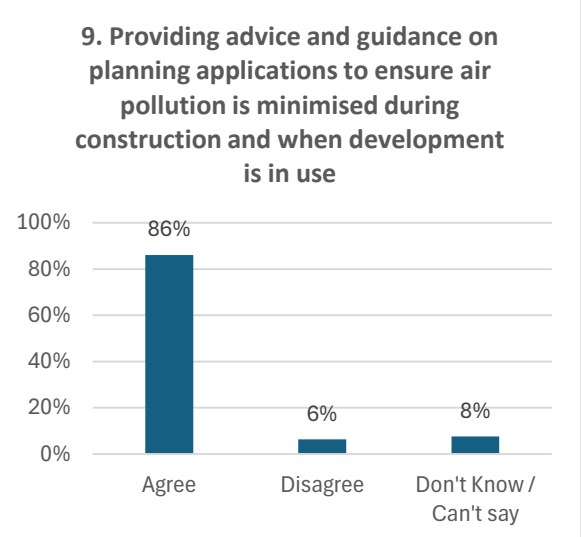


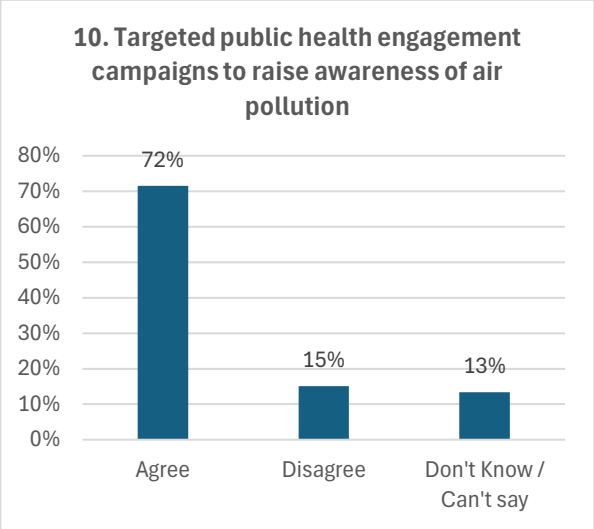


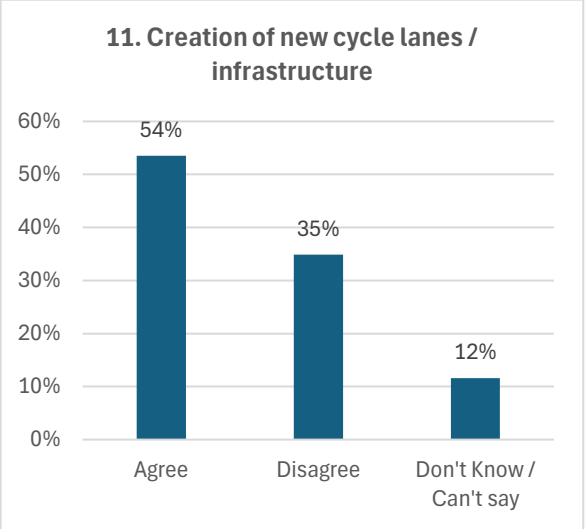


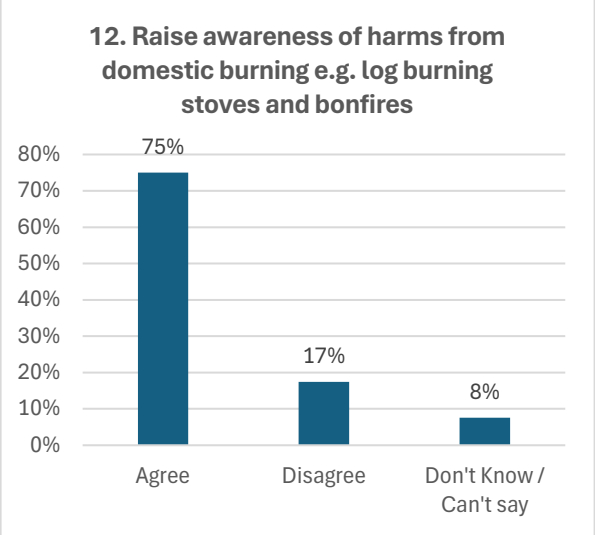


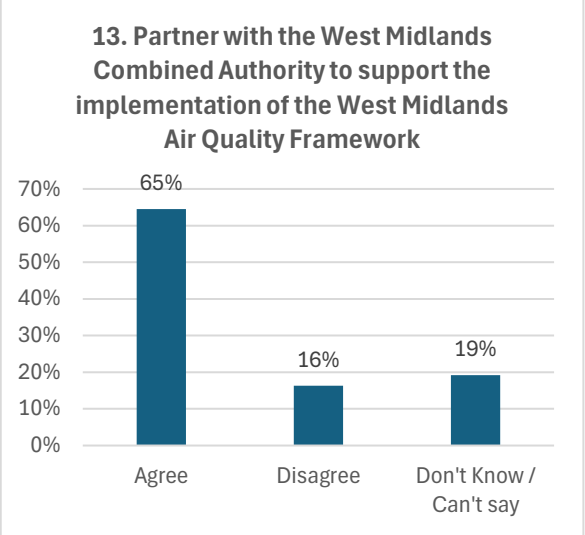


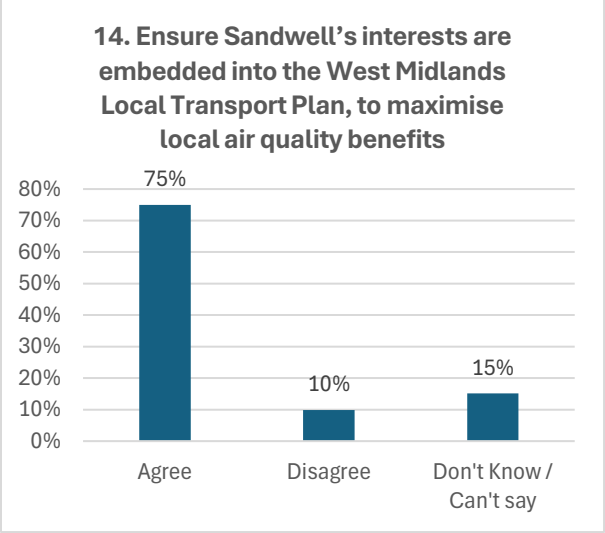


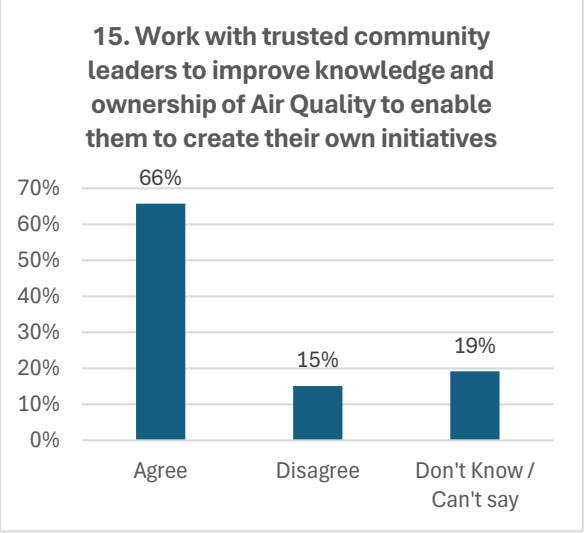

10. Targeted public health engagement campaigns to raise awareness of air pollution
80%
70%
60%
50%
40%
30%
20%
10%
0%
72%
15%
13%
Agree
Disagree
Don't Know / Can't say

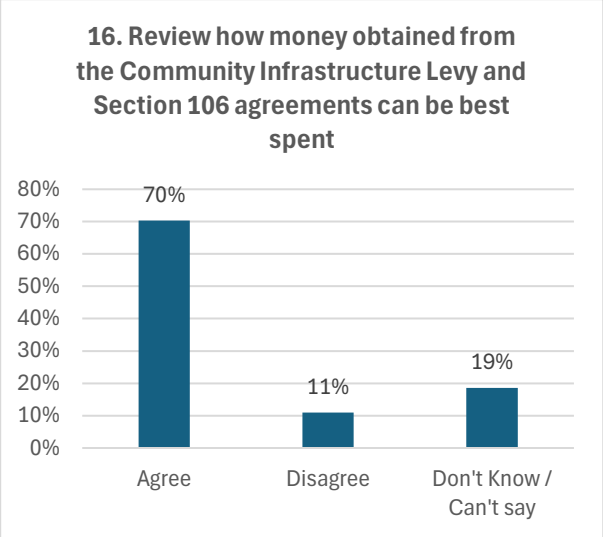

11. Creation of new cycle lanes / infrastructure
60%
50%
40%
30%
20%
10%
0%
54%
35%
12%
Agree
Disagree
Don't Know / Can't say

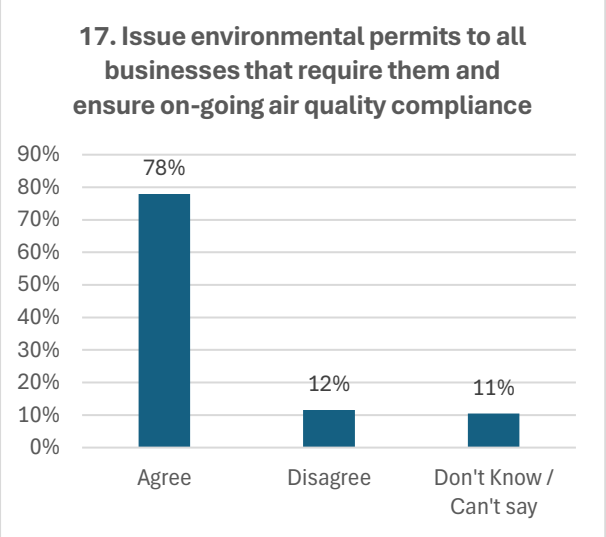

12. Raise awareness of harms from domestic burning e.g. log burning stoves and bonfires
80%
70%
60%
50%
40%
30%
20%
10%
0%
75%
17%
8%
Agree
Disagree
Don't Know / Can't say

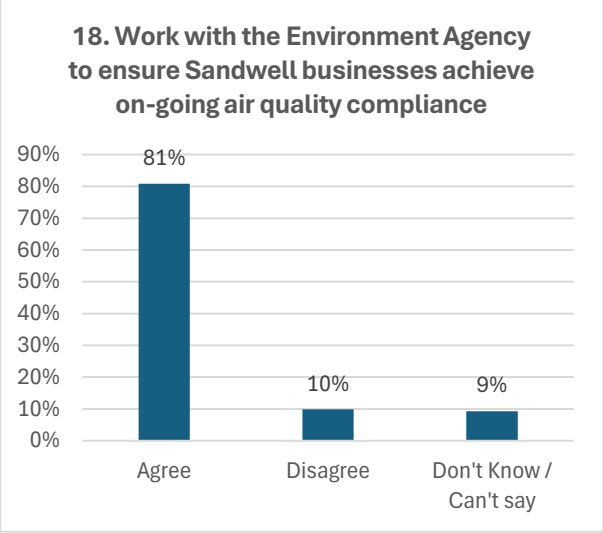

13. Partner with the West Midlands Combined Authority to support the implementation of the West Midlands Air Quality Framework
70%
60%
50%
40%
30%
20%
10%
0%
65%
16%
19%
Agree
Disagree
Don't Know / Can't say

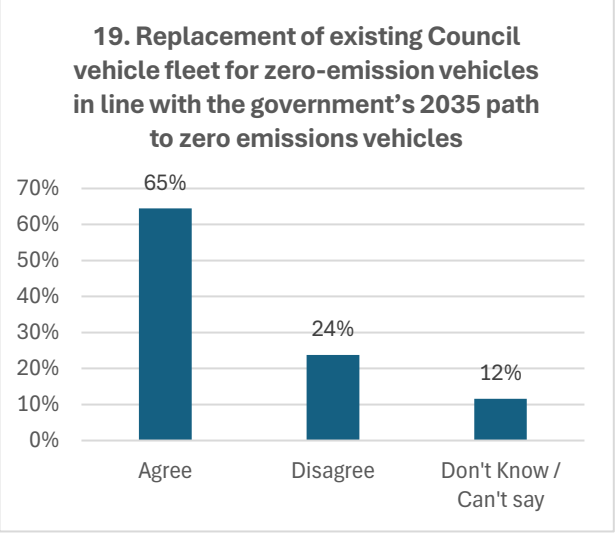

14. Ensure Sandwell's interests are embedded into the West Midlands Local Transport Plan, to maximise local air quality benefits
80%
70%
60%
50%
40%
30%
20%
10%
0%
75%
10%
15%
Agree
Disagree
Don't Know / Can't say

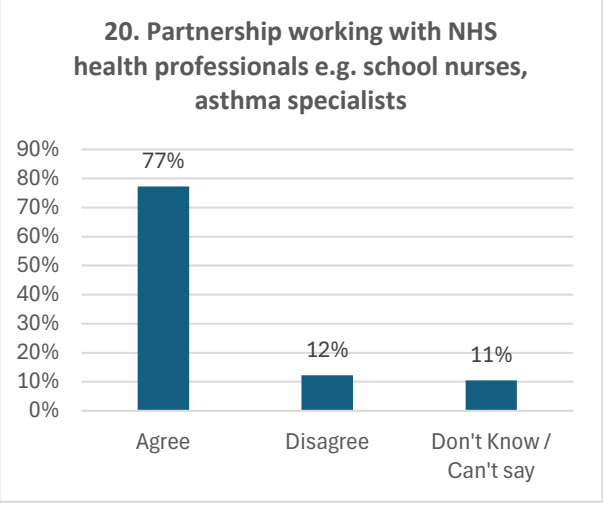

15. Work with trusted community leaders to improve knowledge and ownership of Air Quality to enable them to create their own initiatives
70%
60%
50%
40%
30%
20%
10%
0%
66%
15%
19%
Agree
Disagree
Don't Know / Can't say

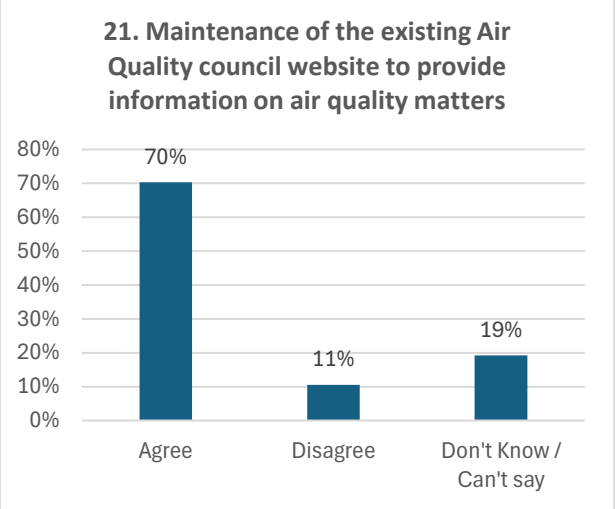

16. Review how money obtained from the Community Infrastructure Levy and Section 106 agreements can be best spent
80%
70%
60%
50%
40%
30%
20%
10%
0%
70%
11%
19%
Agree
Disagree
Don't Know / Can't say


17. Issue environmental permits to all businesses that require them and ensure on-going air quality compliance
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
78%
12%
11%
Agree
Disagree
Don't Know / Can't say


18. Work with the Environment Agency to ensure Sandwell businesses achieve on-going air quality compliance
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
81%
10%
9%
Agree
Disagree
Don't Know / Can't say


19. Replacement of existing Council vehicle fleet for zero-emission vehicles in line with the government's 2035 path to zero emissions vehicles
70%
60%
50%
40%
30%
20%
10%
0%
65%
24%
12%
Agree
Disagree
Don't Know / Can't say


20. Partnership working with NHS health professionals e.g. school nurses, asthma specialists
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
77%
12%
11%
Agree
Disagree
Don't Know / Can't say


21. Maintenance of the existing Air Quality council website to provide information on air quality matters
80%
70%
60%
50%
40%
30%
20%
10%
0%
70%
11%
19%
Agree
Disagree
Don't Know / Can't say

Overall, respondents showed strong agreement with most proposed measures in the Draft Air Quality Action Plan. The highest support was for promoting active travel (77%), enforcing smoke control orders (77%), and creating new cycle lanes (76%). Education initiatives also scored highly, including rolling out the Auntie Duck programme (65%) and accredited school schemes (66%). Other measures were well received such as updating the planning guidance (73%), public engagement campaigns (72%), and partnerships with regional bodies, particularly the NHS (77%). Disagreement levels were generally low; the greatest disagreement was the creation of new cycle lanes (35%) and replacement of the Council fleet with zero emission vehicles (24%).'Don't know' responses were generally low, indicating broad confidence in the proposed actions.

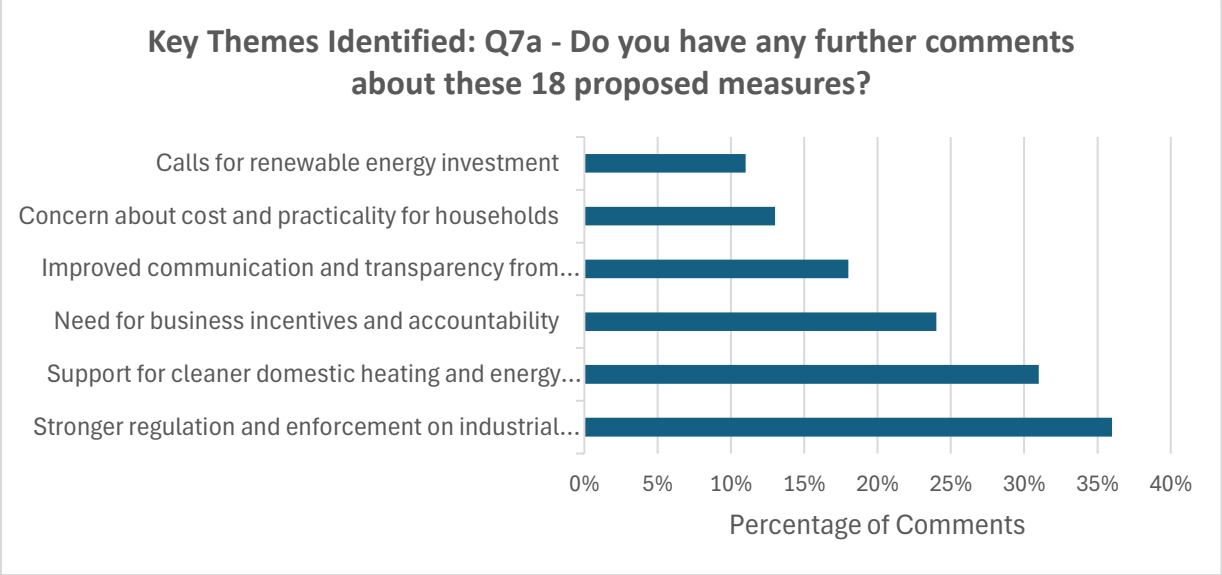
Q7a – "Do you have any further comments about these 18 proposed measures?"

Number of comments: 45

Summary of Feedback

Respondents expressed strong concern about industrial emissions, with many urging tougher regulation, monitoring, and enforcement for businesses. Others called for support to help households and small businesses transition to cleaner, more efficient energy systems.

There was a clear sense that larger emitters should bear greater responsibility, while local authorities should lead by example through transparency, incentives, and renewable investment.



Quotes

"Factories and large businesses should be held to stricter standards; they cause the biggest issues."

"We need help to insulate homes and move away from gas, not everyone can afford the changes."

"Businesses should get incentives to adopt cleaner technologies, not just penalties."

"The council should share emission data so residents can see what's improving."

"Renewables are the long-term answer, solar and wind should be part of every new development."

"People want to help, but many can't afford heat pumps or new systems yet."

Key Takeaways

- There is strong consensus that industrial and commercial actors must play a lead role in emissions reduction, supported by transparent monitoring and public accountability. Respondents also highlighted household-level challenges, particularly cost and awareness barriers
- While enforcement is viewed as essential, many also recognise that incentives, grants, and public education are key to achieving lasting change. The feedback suggests a balanced approach between regulation and support, underpinned by clearer communication from local authorities.

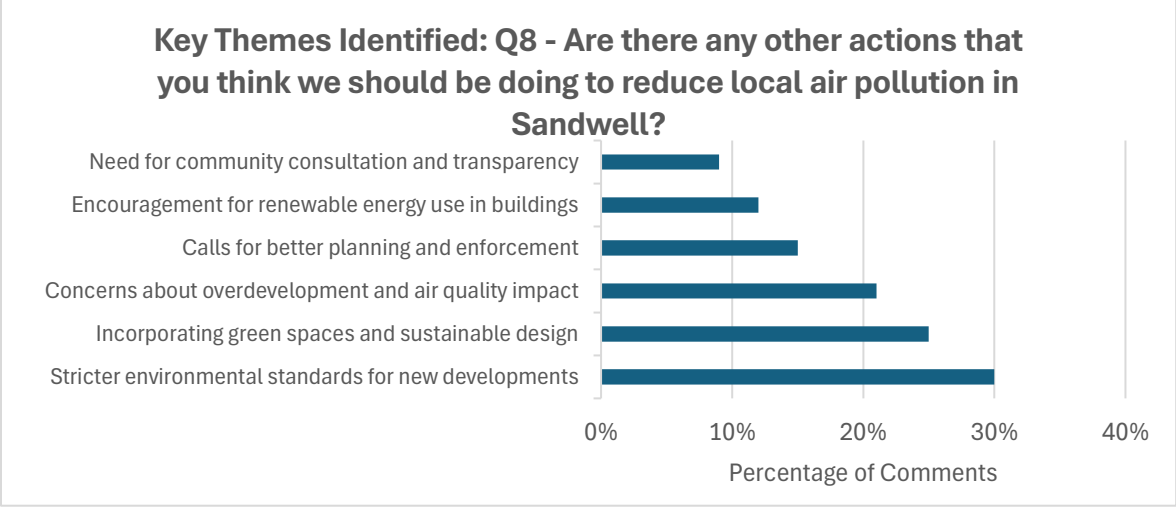
Q8 – "Are there any other actions that you think we should be doing to reduce local air pollution in Sandwell?

Number of comments: 67

Summary of Feedback

Respondents expressed strong concern that new developments in Sandwell must meet higher environmental standards to avoid worsening air quality and congestion. Many comments called for greener planning policies, including energy-efficient buildings, sustainable transport links, and green infrastructure such as trees and open spaces.

There was also frustration that existing planning enforcement is inconsistent, with calls for stricter oversight and better community consultation on development impacts.



Quotes

"*Developers should be required to include solar panels, EV charging, and proper insulation from the start."*

"We need more trees and green corridors, not more concrete, they help air quality and wellbeing."

"Too many developments go ahead without considering the extra traffic and pollution."

"Planning rules are fine, but they need to be enforced consistently."

"The council should make sure all new buildings are energy efficient and future-proofed."

"Residents should have a say when large developments could increase emissions locally."

Key Takeaways

- Overall, the feedback reflects broad public support for integrating climate and air quality priorities into planning policy. Respondents see new development as both a risk and an opportunity — it can either worsen pollution or model sustainable growth, depending on how it's managed.
- The most common calls were for stronger planning policy, green infrastructure, and developer accountability. Residents also expressed a desire for transparent communication and enforcement, suggesting a gap between stated sustainability ambitions and perceived real-world delivery.

8. Potential for the AQAP to have a negative impact

Q9. Are you aware of any negative impact that the AQAP could have on residents or visitors to Sandwell?

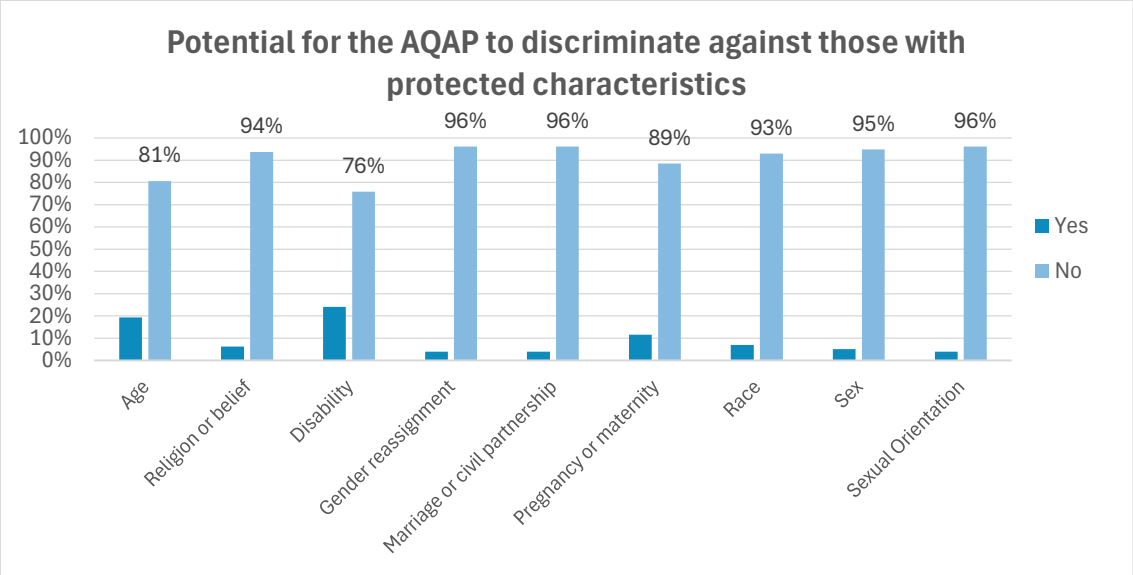
Out of 171 respondents, **29.2%** said they were aware of possible negative impacts the AQAP could have on residents or visitors to Sandwell, while **70.8%** said they were not aware of any.

Q10. Are you aware of any negative impact that the AQAP could have on Sandwell's businesses or economy?

Out of 167 respondents **27.5%** said they were aware of possible negative impacts that the AQAP could have on Sandwell's business or economy, while **72.5%** said they were not aware of any.

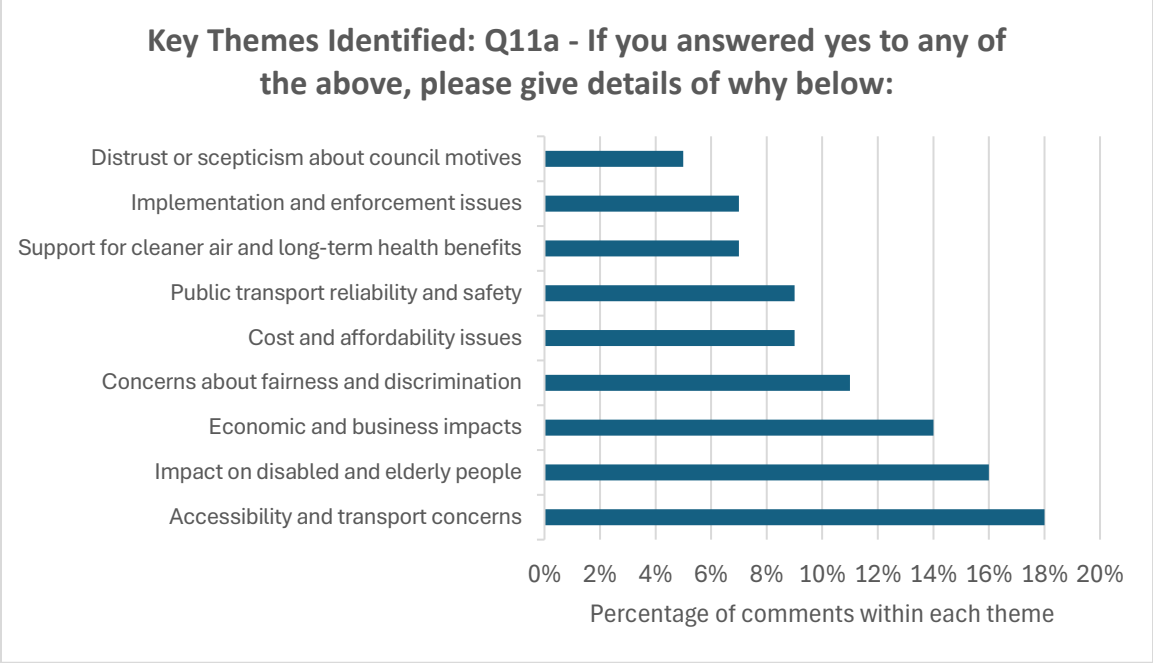
Q11. Do you think this AQAP could discriminate against someone because of their: age; religion or belief; disability; gender reassignment; marriage or civil partnership; pregnancy or maternity; race; sex; sexual orientation?

Between 150 -160 responses were received per question and results are shown in the bar chart below.



Q11a – "If you answered yes to Q9, Q10 or Q11, please give details of why."

Number of comments: 44



Quotes

"Older and disabled people may need to use their own car to maintain independence."

"Making it more difficult or expensive to drive could effectively trap some disabled people in their homes."

"Cost of living means people can't afford cycles or electric cars – pensioners cannot afford £40,000 vehicles."

"Public transport is not safe; buses are overcrowded and unreliable."

"Active travel isn't possible for all disabled people – enforcement must consider exceptions."

"If businesses are forced to upgrade vehicles, it could cost jobs or make it harder for small firms."

"I support cleaner air, but Sandwell Council needs to show real data on air quality improvement."

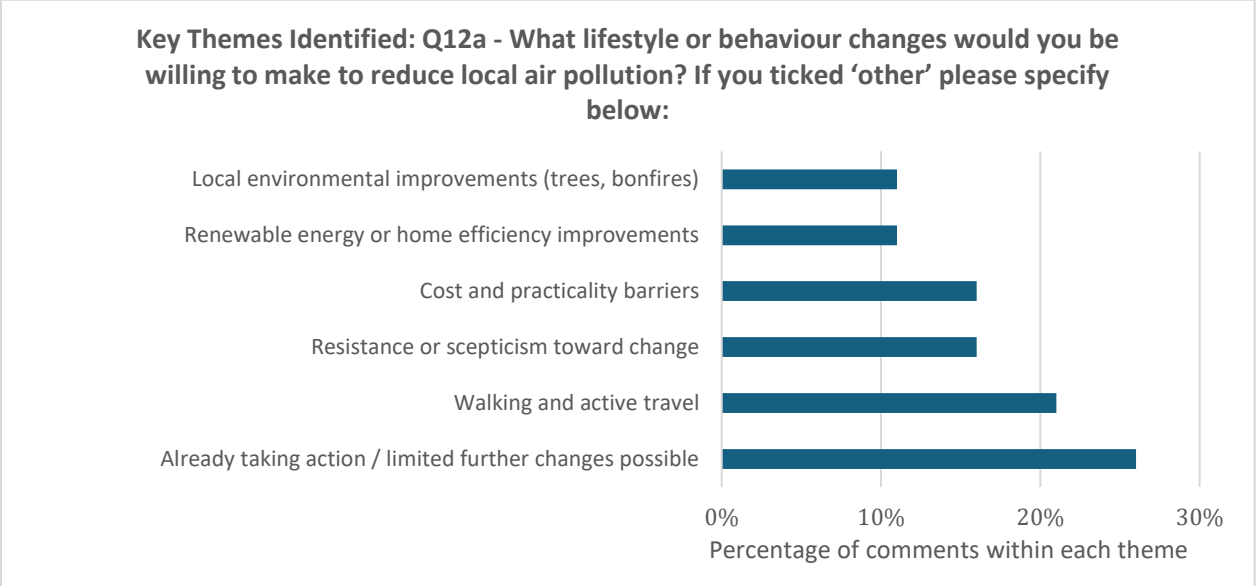
Key Takeaways

- Most respondents accepted the importance of tackling air quality, but their feedback was dominated by concerns about accessibility, fairness, and the unintended consequences of the Air Quality Action Plan (AQAP).
- Respondents expressed anxiety that changes could penalise disabled, elderly, or low-income residents, or impose costs on small businesses. Others questioned the safety and practicality of public transport, noting that infrastructure must improve before car use is restricted.
- Although a minority saw the AQAP as necessary for long-term public health, even supporters emphasised the need for balanced, inclusive implementation and clear communication about benefits and exemptions**.**

9. Actions that respondents are willing to take to improve local air quality

Q12a. What lifestyle or behaviour changes would you be willing to make to reduce local air pollution other than those listed in Q.12?

Number of comments: 19



Quotes

"*Take opportunity to walk places when I can.*"

"Already walk as much as I can."

"Would be good to replace items but not cost effective for me."

"Look at installing solar panels on council properties, replace end of life boilers with heat pumps."

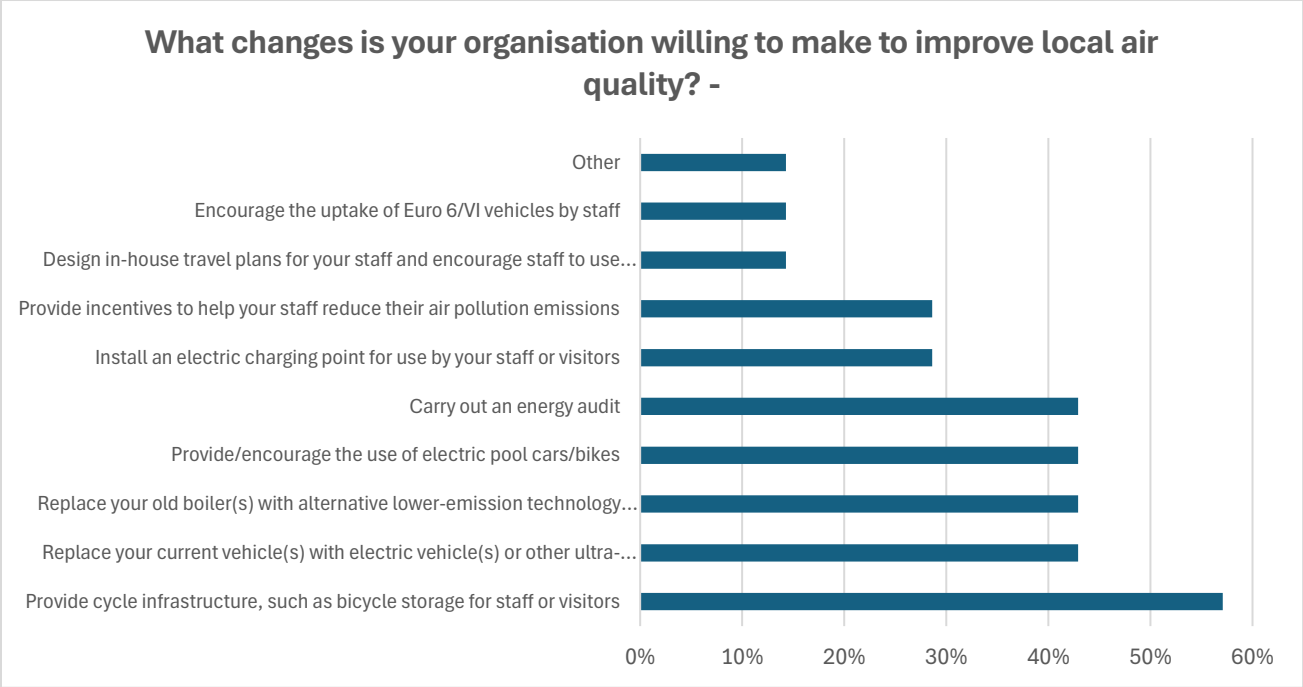
"Plant some trees. Reduce or stop bonfires at home."

Key Takeaways

- Most participants either felt they were already doing what they could, or were open to modest changes such as increased walking or avoiding unnecessary car trips.
- A smaller but notable subset expressed frustration or scepticism about the survey or the feasibility of making lifestyle changes, often citing cost and practicality barriers.
- There is also a modest appetite for systemic or council-led actions such as tree planting and renewable energy investment.

Q13 "What changes is your organisation willing to make to improve poor air quality?"

7 Comments

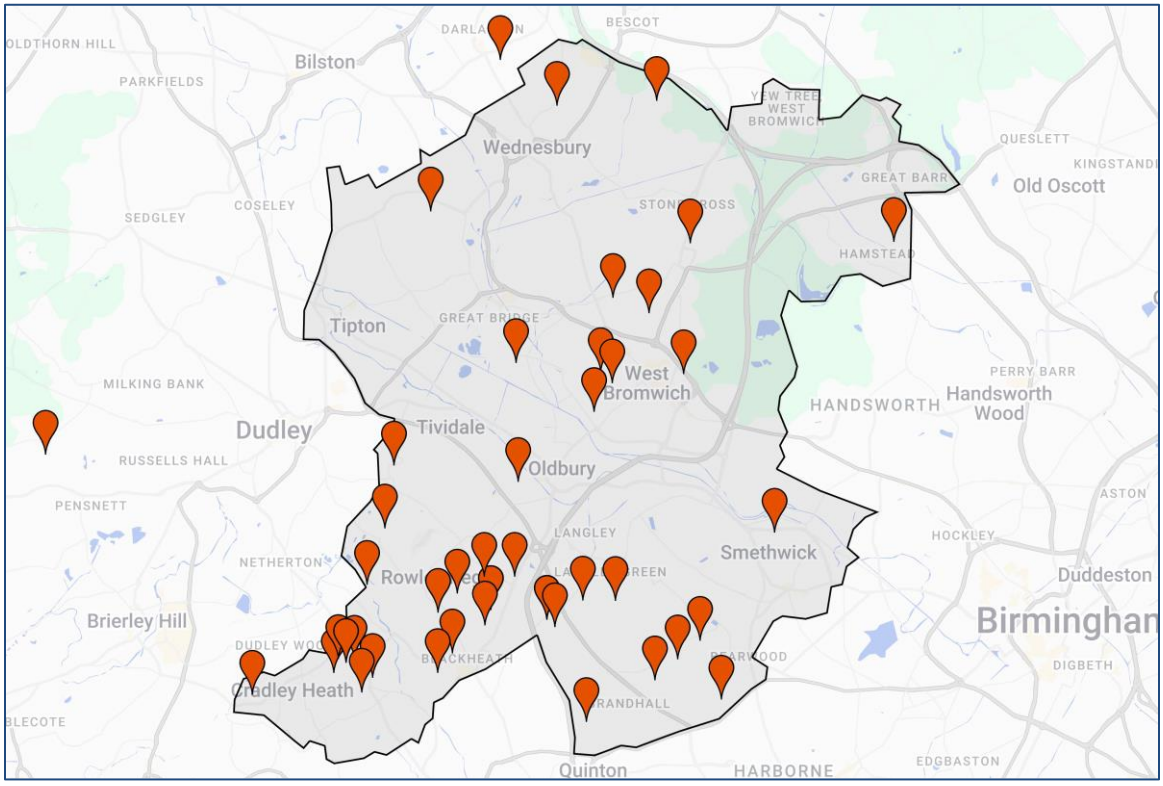


Schools Survey Results

1. Geographical distribution of respondents

Participants were asked to provide their postcode to help aid our understanding of the geographical distribution of responses across the borough.

2.1 – Map showing location of those responding to the School's Survey

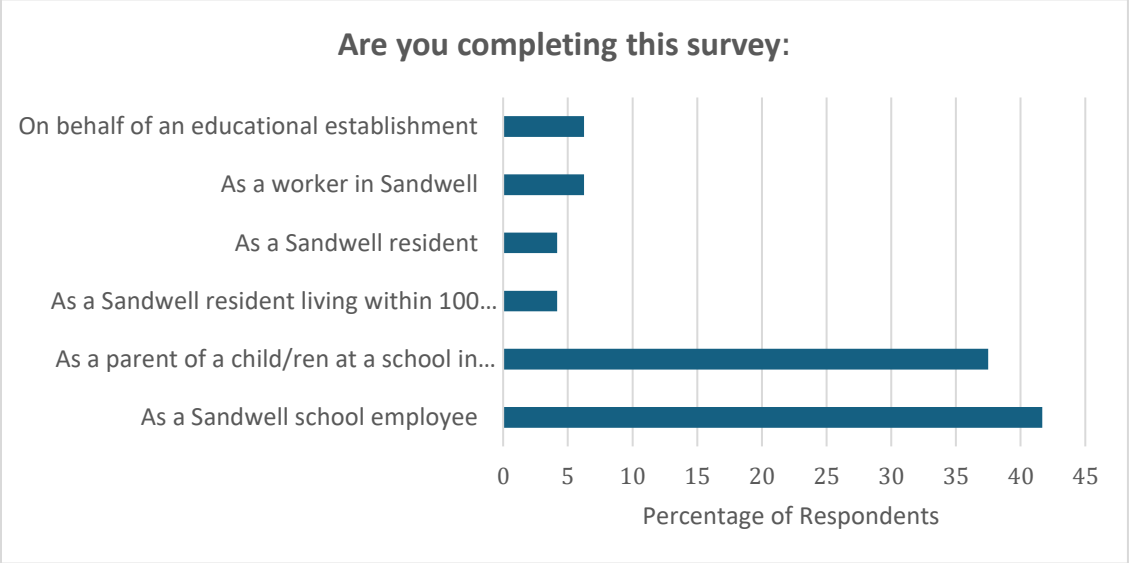


The map shows that the 48 survey respondents are spread across Sandwell, with clusters concentrated in the southern areas around Rowley Regis and Oldbury, and fewer responses from the northern parts near Wednesbury and Great Barr. Overall, participation appears uneven, with higher engagement in the south and west of the borough.

2. Reason for participation in the survey

Q1 - Are you completing this survey:

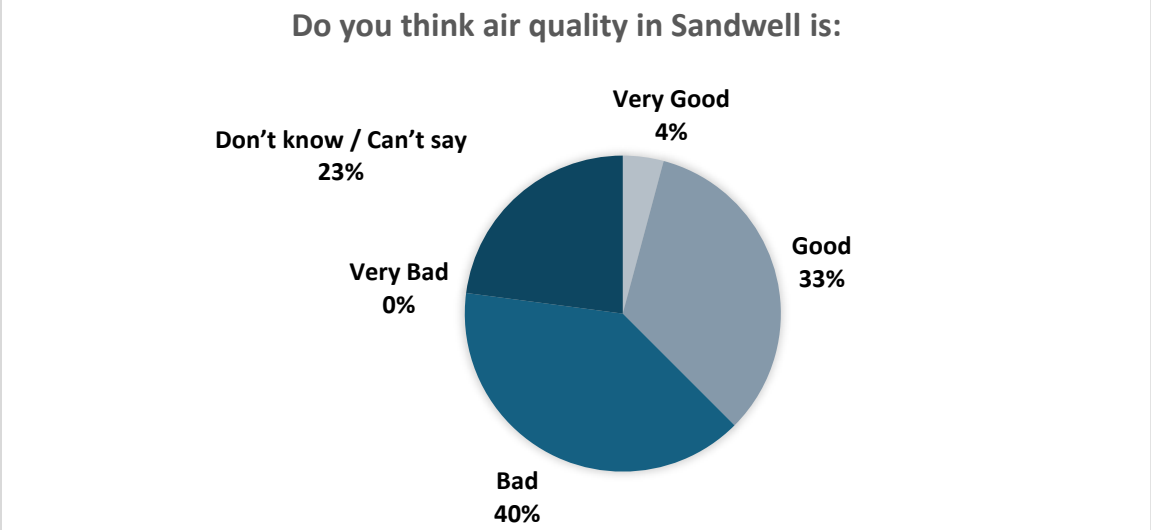
48 Respondents



3. Air quality in Sandwell

Please note: Responses have been categorised into themes to help with analysis, and some responses include more than one theme; as a result, totals may exceed 100% in the themed bar charts.

Q.1 Do you think air quality in Sandwell is very good, good, bad, very bad, don't know/can't say?



38% of respondents considered air quality to be good or very good, although 40% considered it bad and 23% didn't know. This demonstrates that nearly one quarte of those participating did not consider that they had adequate knowledge about local air quality to give an opinion.

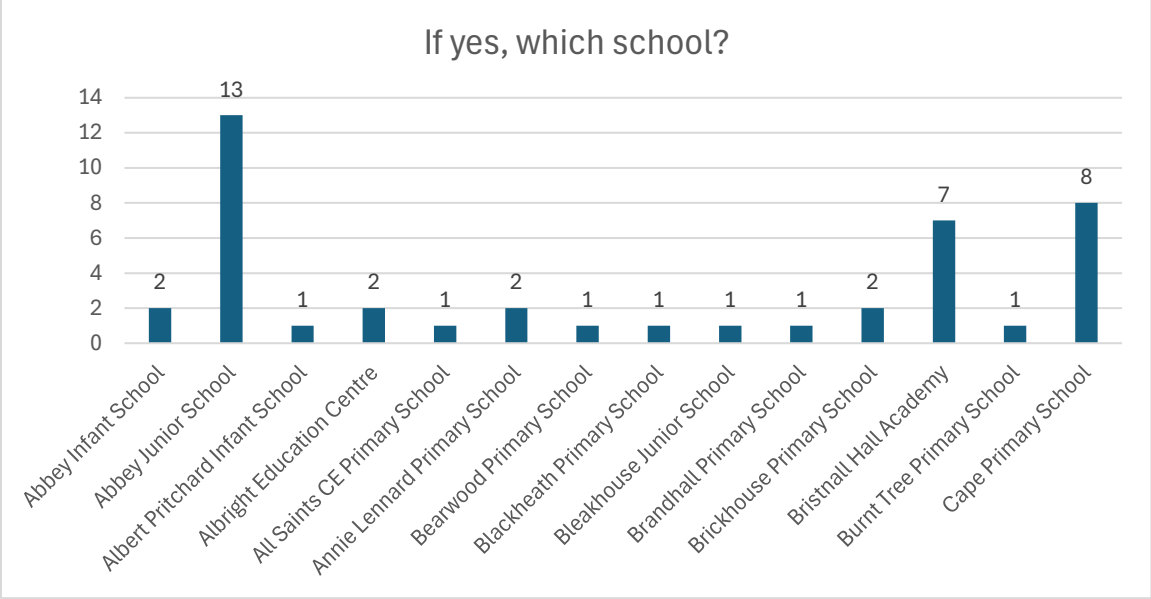
Q2. Do you have an interest in a specific school in Sandwell (e.g. work there, children attend, live near, school governor)?

48 Responses

NO 10.4%

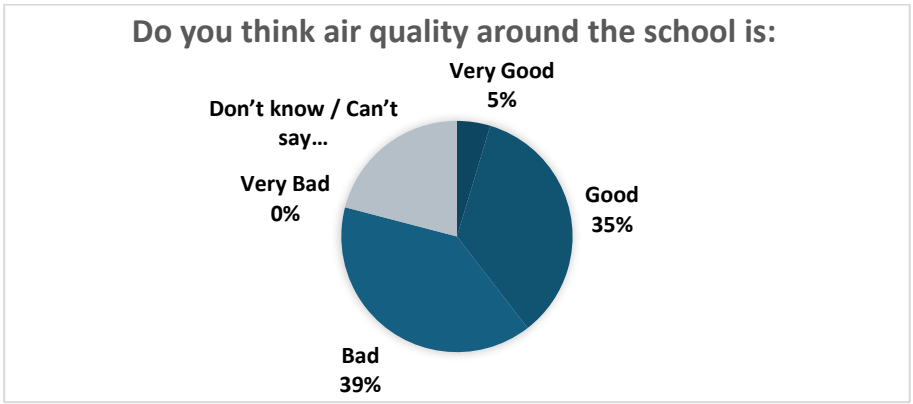
YES 89.6 &

If the answer to Q2 was 'yes' which school?



Q3. Do you think air quality around the above-named school is: Very Good; Good; Bad; Very Bad; Don't know / Can't say

48 Responses



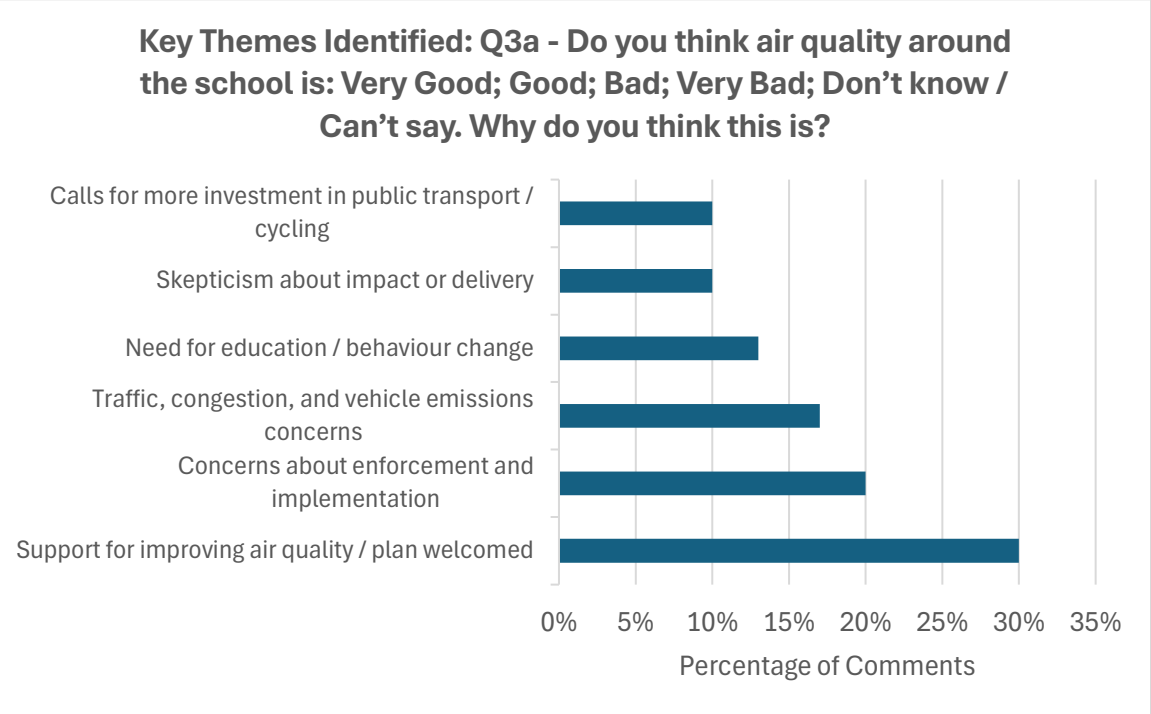
This pie chart shows that most respondents were very split over air quality around their schools, with 40% believing it to be 'Good' or 'Very Good' and 39% being 'Bad'. However, 21% were unsure, again indicating a lack of knowledge about local air quality. No respondents rated air quality outside their school as being 'Very Bad'.

Q3a. Why do you think air quality around the school is: Very Good; Good; Bad; Very Bad; Don't Know / Can't Say?"

Total Comments: 30

Summary of Feedback

Mixed but leaning towards being positive, although respondents generally support the aims of improving air quality but emphasise the need for stronger enforcement, infrastructure investment, and public education.



Quotes

"It's good to see Sandwell taking air pollution seriously, this should have happened years ago."

"Any plan that helps reduce pollution and improve children's health is welcome."

"Plans are great, but without enforcement, it's just words."

"The biggest issue is constant traffic jams on main roads."

"Stop/start traffic makes pollution worse need better traffic flow management."

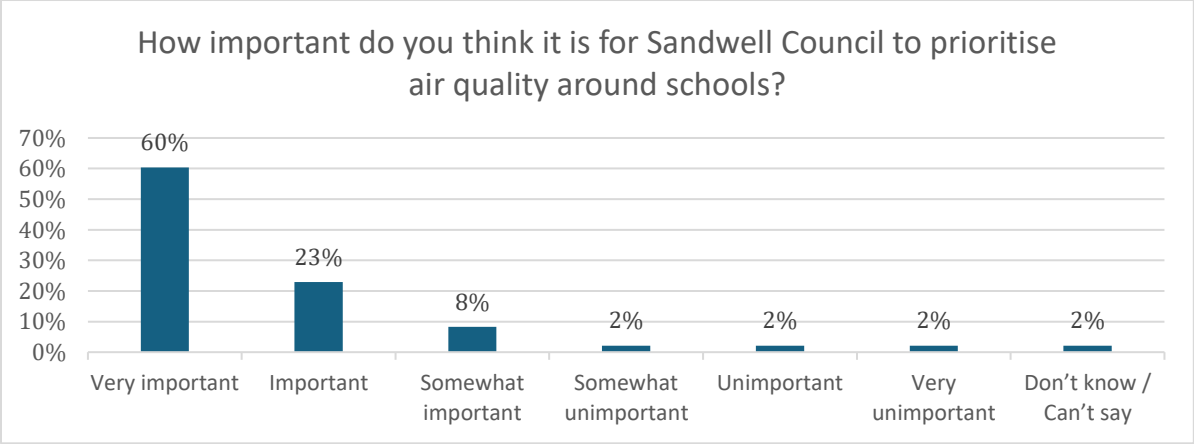
"People need education about pollution, not just penalties."

"Better buses and cycle lanes would make a big difference."

Key Takeaways

- There is broad public support for improving air quality.
- Respondents demand practical, enforceable action, not just strategy documents.
- Traffic management and behaviour change campaigns are central concerns.
- The public expects visible leadership and accountability from Sandwell MBC.

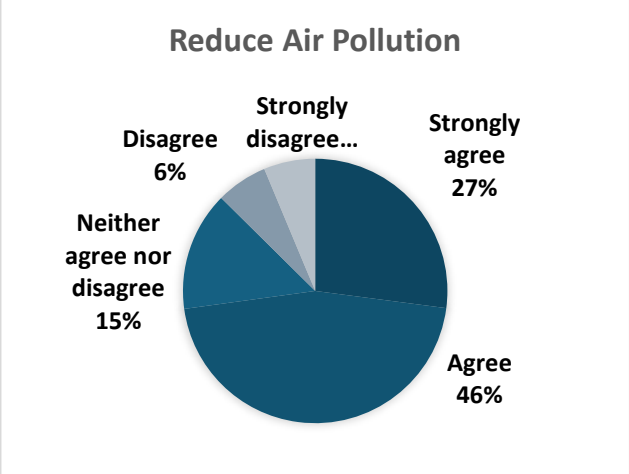
Q4. How important do you think it is for Sandwell Council to prioritise air quality around schools?

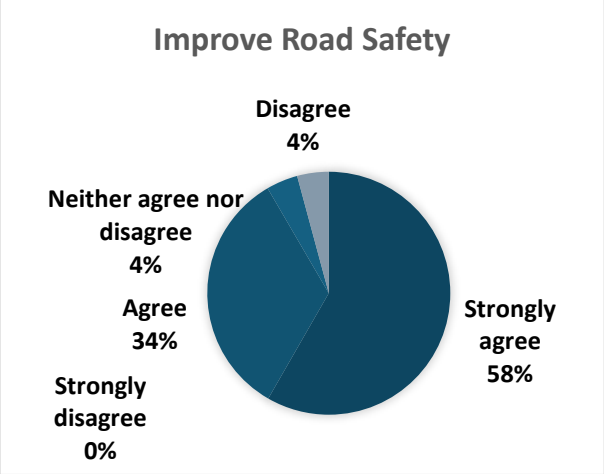


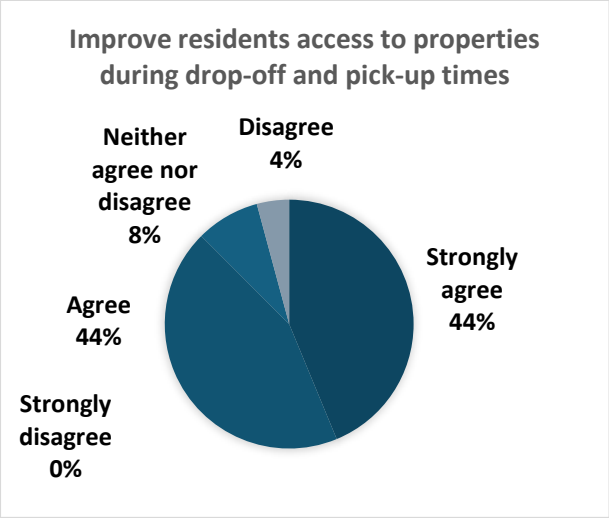
The bar chart shows that most respondents believe it is important for Sandwell Council to prioritise air quality around schools, with 83% rating it as 'Very important' or 'Important'. Only a small minority (around 6%) considered it unimportant or somewhat unimportant, while 2% were unsure.

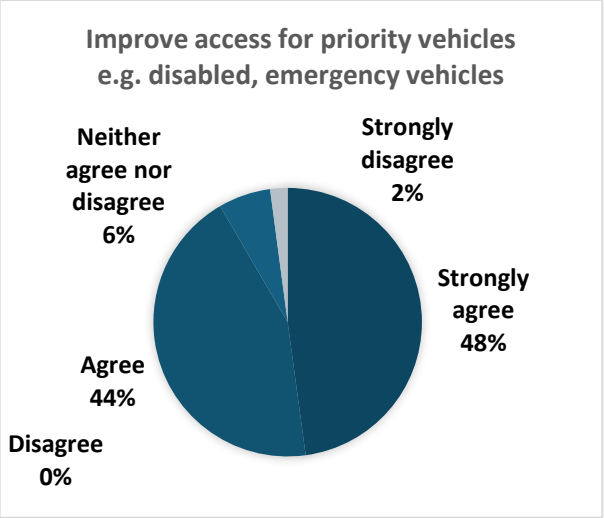
4. Views on introducing more School Streets into Sandwell

Q5. To what extent do you agree that introducing more School Streets into Sandwell will:







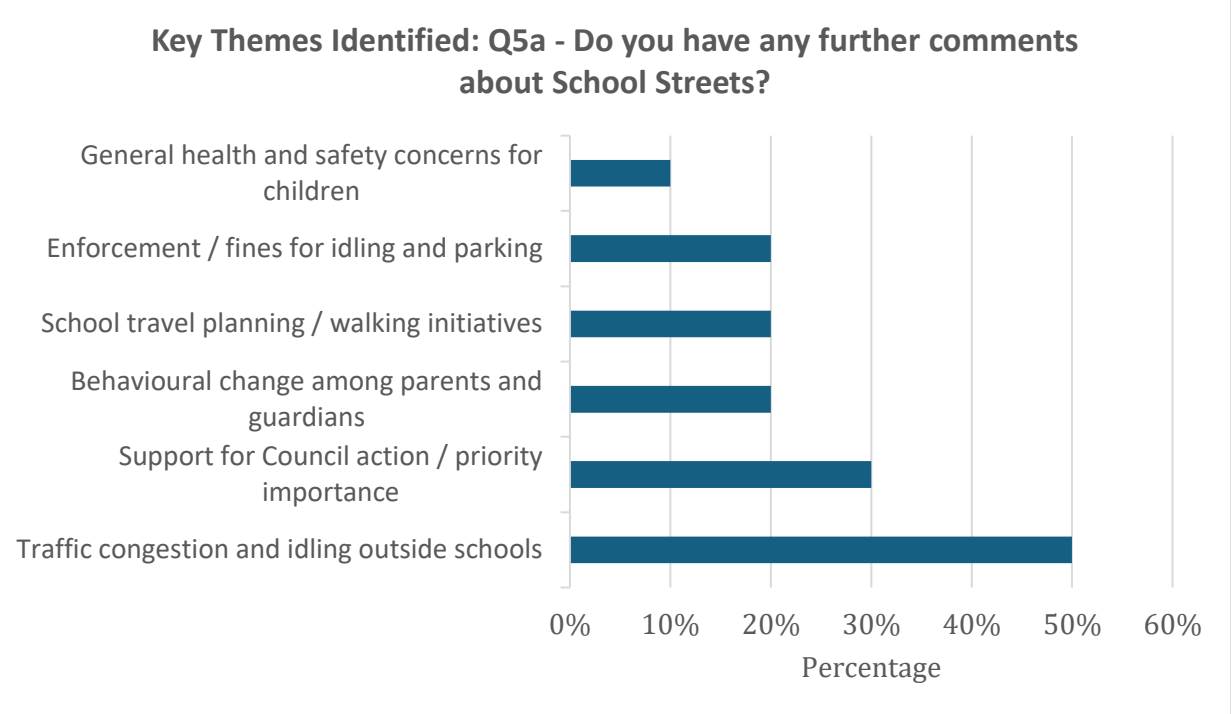


Q5a: "Do you have any further comments about School Streets?"

Total Responses: 10

Summary of Feedback

Strongly supportive. Respondents overwhelmingly agree that air quality near schools must be a top priority, with repeated references to traffic congestion, idling vehicles, and parental behaviour at school drop-off times.



Quotes

"*The biggest problem is cars idling right outside the school gates.*"

"Traffic jams at 3pm are terrible, the fumes are awful for children."

"Excellent idea, this should be one of the Council's top priorities."

"Air pollution around schools is unacceptable."

"It's not just about rules, people need to change their habits."

"Encourage walking groups, it works in other areas."

"More fines for idling cars - people ignore the signs."

"Children's lungs are being damaged - urgent action is needed."

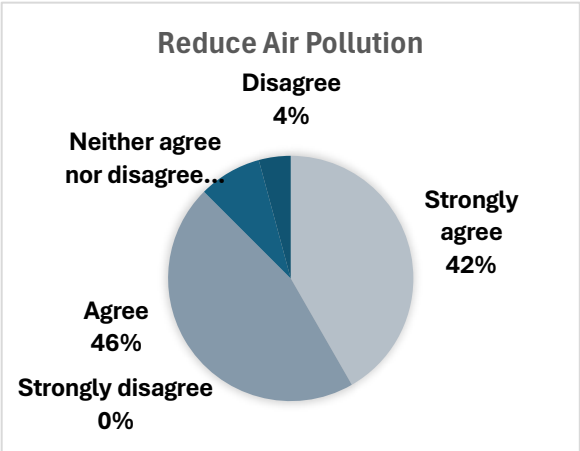
Key Takeaways

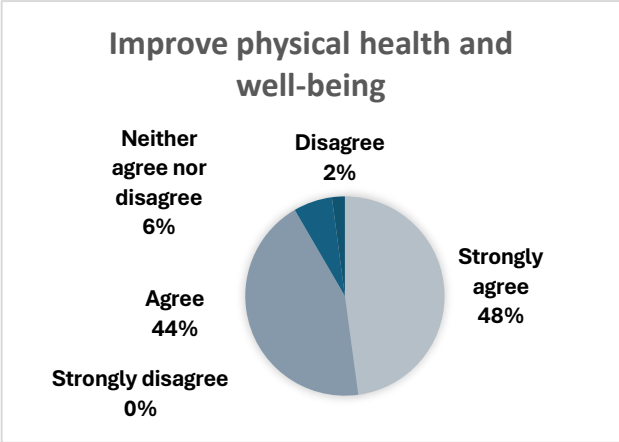
- Respondents see schools as pollution hotspots requiring urgent attention.
- Parental driving habits and traffic management are dominant issues.
- There is strong public backing for Council-led interventions, particularly around enforcement and education.

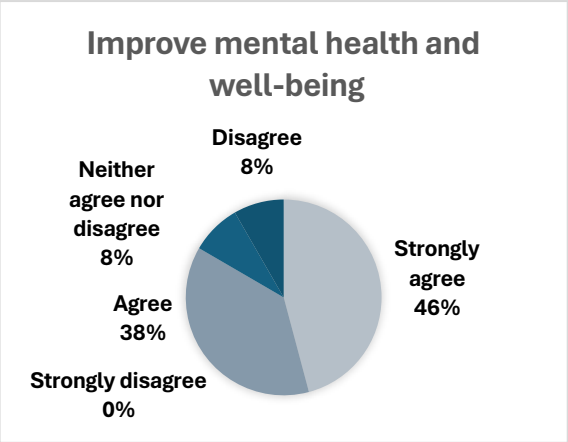
5. Active and sustainable travel planning

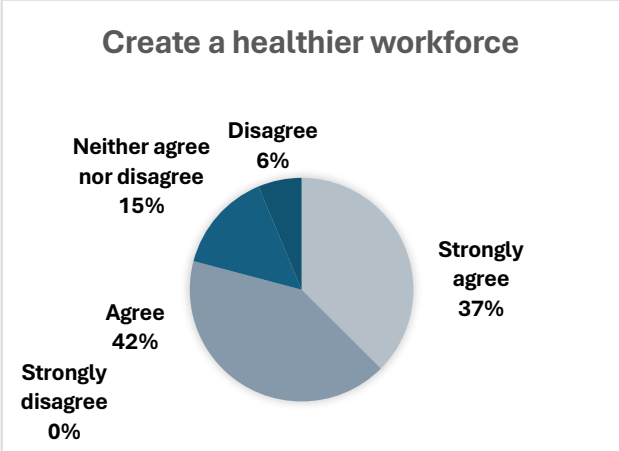
Q6. To what extent do you agree that active and sustainable travel planning in Sandwell will:

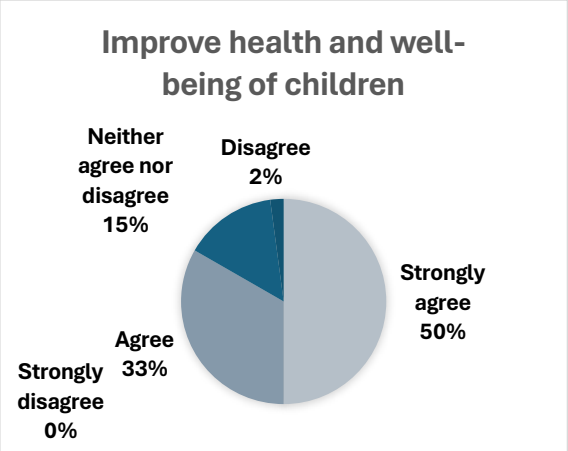
48 Responses







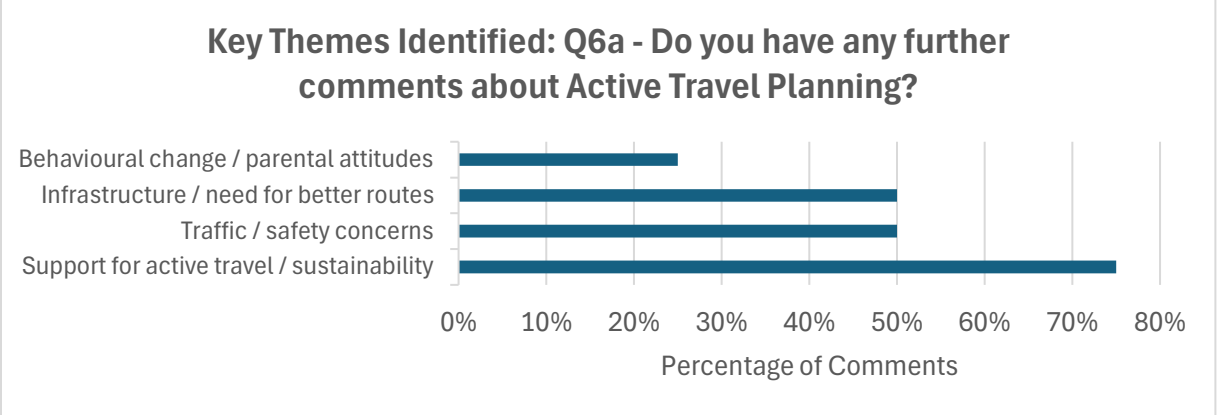




These charts show strong agreement that active and sustainable travel planning in Sandwell will deliver multiple benefits. Most respondents agree or strongly agree that it will reduce air pollution (88%), improve road safety (96%), and enhance physical (92%) and mental health (83%). Similar high levels of agreement were seen for creating a healthier workforce (79%) and improving children's health and well-being (92%), with very few respondents disagreeing.

Q6a – "Do you have any further comments about Active Travel planning?"

Total Responses: 4



Quotes

“Active travel is a great way to get children moving and reduce cars around schools.”

“Good idea, but more needs to be done to make walking and cycling safe.”

“Parents won’t walk if roads feel unsafe or crossings are too far.”

“Too much traffic near schools to make walking practical for some families.”

“Better paths and cycle lanes are needed for this to work.”

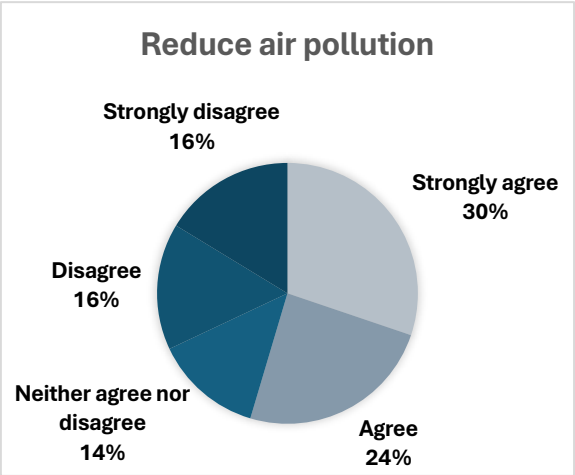
“People still prefer to drive even short distances; they need education to change that.”

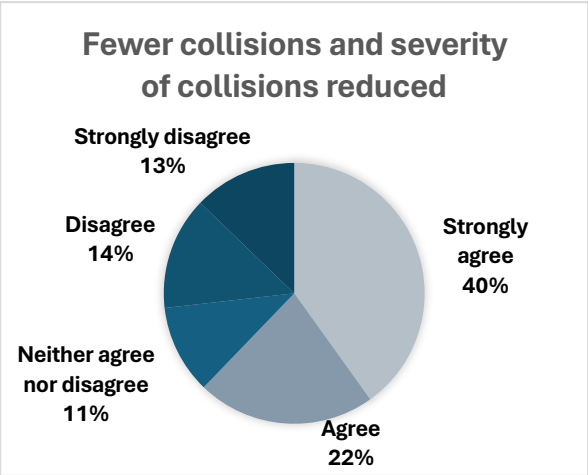
Key Takeaways

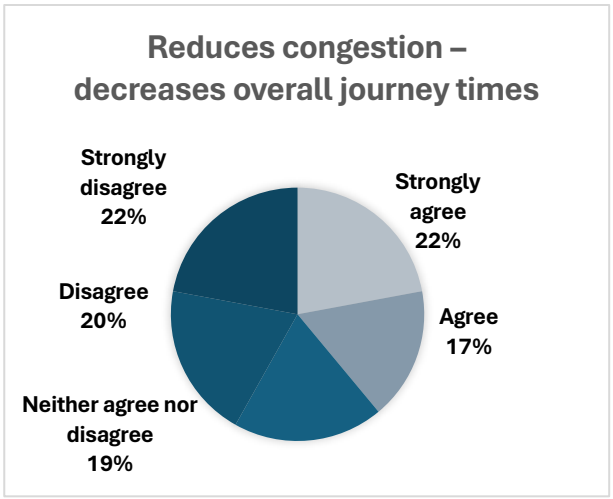
- Overall support for active travel is strong, 75% of respondents expressed positive views or endorsement for sustainable transport planning.
- Traffic and safety continue to appear as the main barriers to walking or cycling, mentioned by half the respondents.
- Infrastructure improvements, such as safer crossings, dedicated cycle paths, or better-maintained pavements, were raised by 50% as necessary for encouraging participation.
- Behavioural challenges, one respondent highlighted parental habits or convenience as obstacles to success.
- Minimal negativity in the responses provided

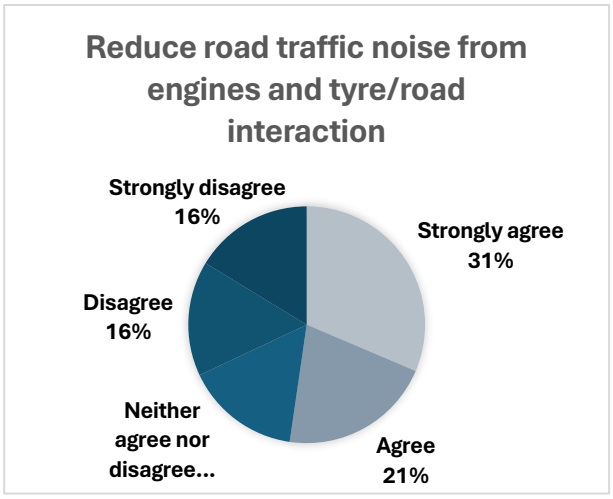
6. Reducing the speed limit on some of Sandwell’s roads

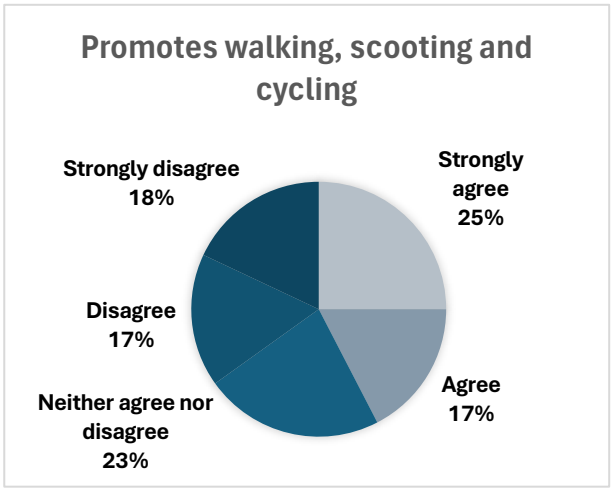
Q6. To what extent do you agree that reducing the speed limit on some roads in Sandwell will:

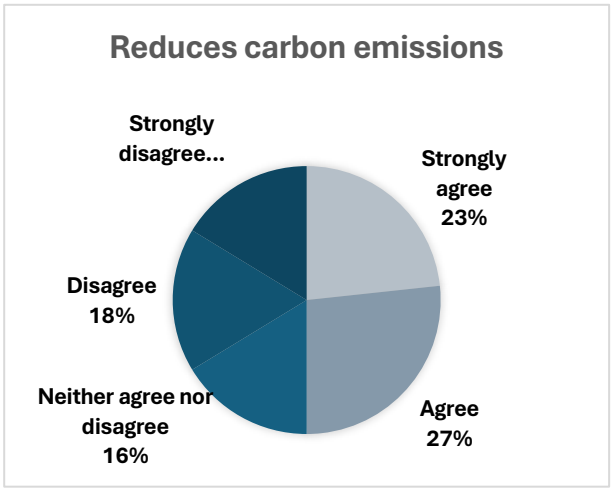












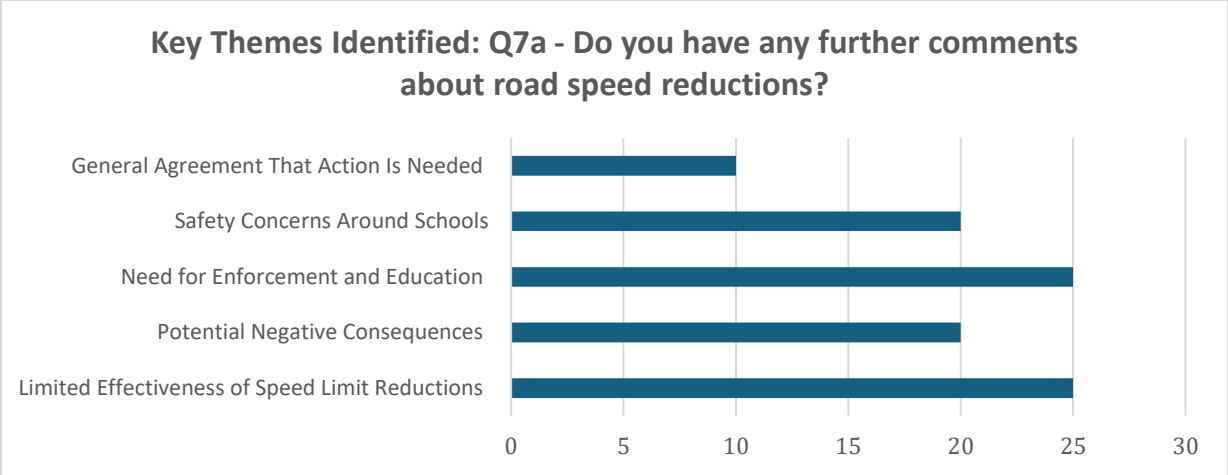
The charts show that opinions on reducing speed limits are mixed. While many respondents **agree or strongly agree** that it could reduce collisions (62%) and road noise (54%), fewer believe it will significantly reduce air pollution (46%) or congestion (34%). Support for promoting walking/cycling and cutting carbon emissions is moderate, with around 42–52% agreeing.

Q7a: "Do you have any further comments about reducing speed limits on some of Sandwell's roads?"

Responses: 5

Summary of Feedback

Feedback is mixed and skeptical about speed limit reductions as a standalone solution. While some benefits are acknowledged (especially safety), respondents favor enforcement, education, and broader strategies over simply lowering speed limits.



Representative Quotes

““Reducing speed limits doesn't solve anything. It makes impatient people overtake and speed causing more issues.”

“Having driven through a number of the 20mph zones around Birmingham, they don't behaviourally change a lot of drivers.”

“It's a waste of time unless it is enforced on a regular basis. Speeding and parking by schools is rarely enforced now.”

“Darbys Hill you took away the lollipop person. Regent Road you took away the lollipop person… SPEEDING ON REGENT ROAD IS AWFUL.”

Key Takeaways

Speed limit reductions alone rarely change driver behaviour.

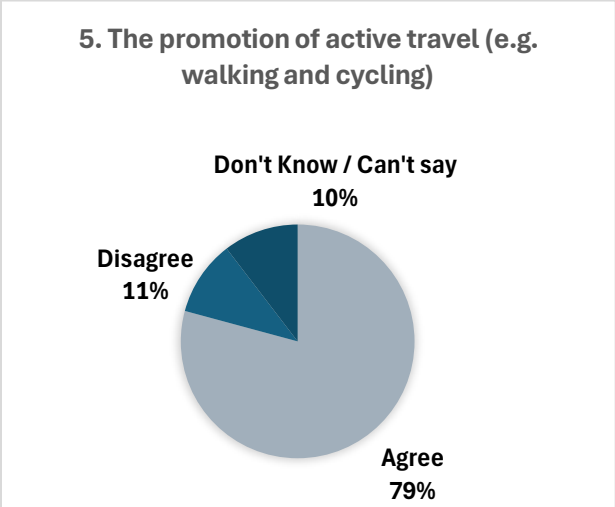
Slower speeds may cause congestion and increase emissions.

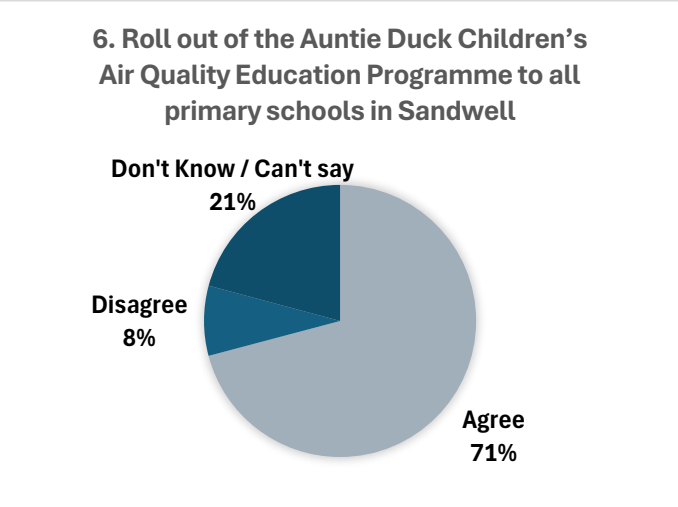
Enforcement and education are seen as more effective than limits.

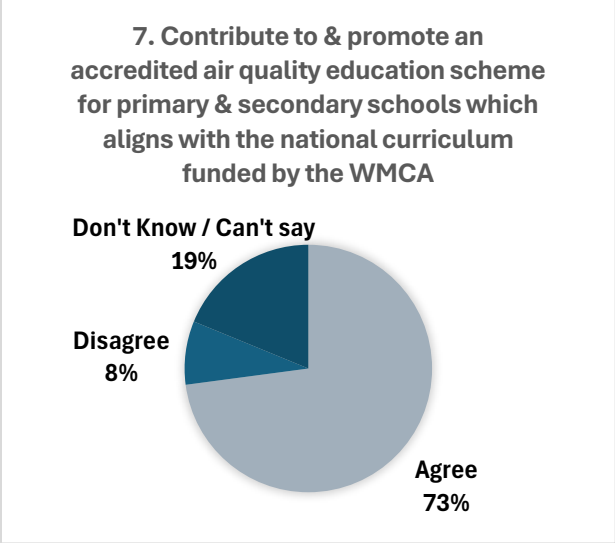
Safety near schools is a major concern, especially after loss of crossing staff.

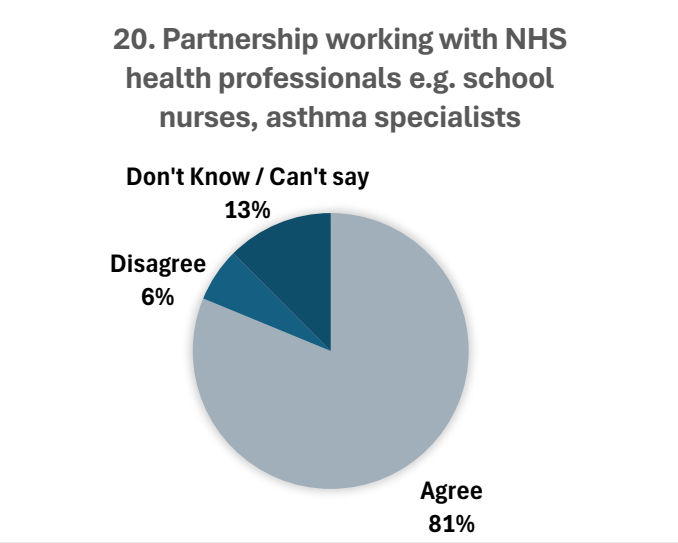
7. Additional proposed measures in the AQAP to improve local air quality

Q8 To what extent do you agree with the following proposed measures?









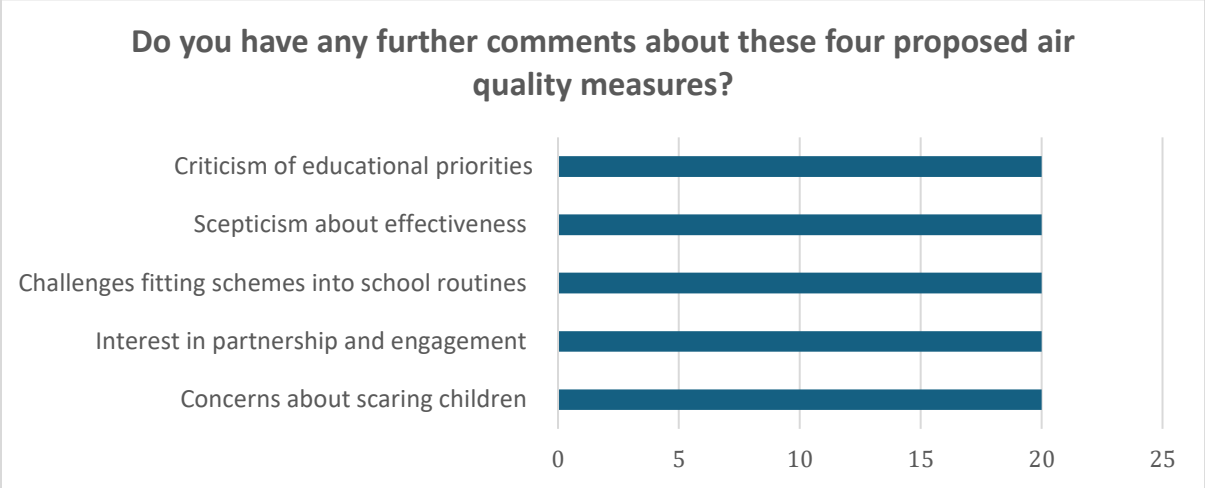
These results show strong support for all proposed measures. Promoting active travel received the highest agreement (79%), followed by partnership with NHS health professionals (81%) and air quality education schemes for schools (73%). The Auntie Duck education programme also had high support (71%), though slightly more respondents were unsure about this measure, probably because they aren't aware of what it is.

Q8a: "Do you have any further comments about thee four proposed air quality measures?"

Total Responses: 5

Summary of Feedback

There were very few comments, but these were more negative, highlighting practical challenges, scepticism about impact, and concerns about competing priorities in schools. Although there is clear interest as identified in the responses to Q8, actions must ensure collaboration and engagement, as successful implementation will require careful planning, reassurance, and support for schools.



Quotes

"Good to get messages across but scaring children isn't always good."

"I would be interested in completing a quality mark linked to air quality / asthma practices."

"Hard to fit in schemes with everything else, but we do try!"

Key Takeaways

- Strong support for promoting active travel and education programmes.
- Partnerships with health professionals and schools widely welcomed.
- Mixed views on speed limit reductions; safety benefits noted, but scepticism about impact on air quality and congestion.
- Enforcement and education seen as more effective than speed limits alone.
- Safety around schools is however a major concern.
- Schools face practical challenges implementing new schemes.

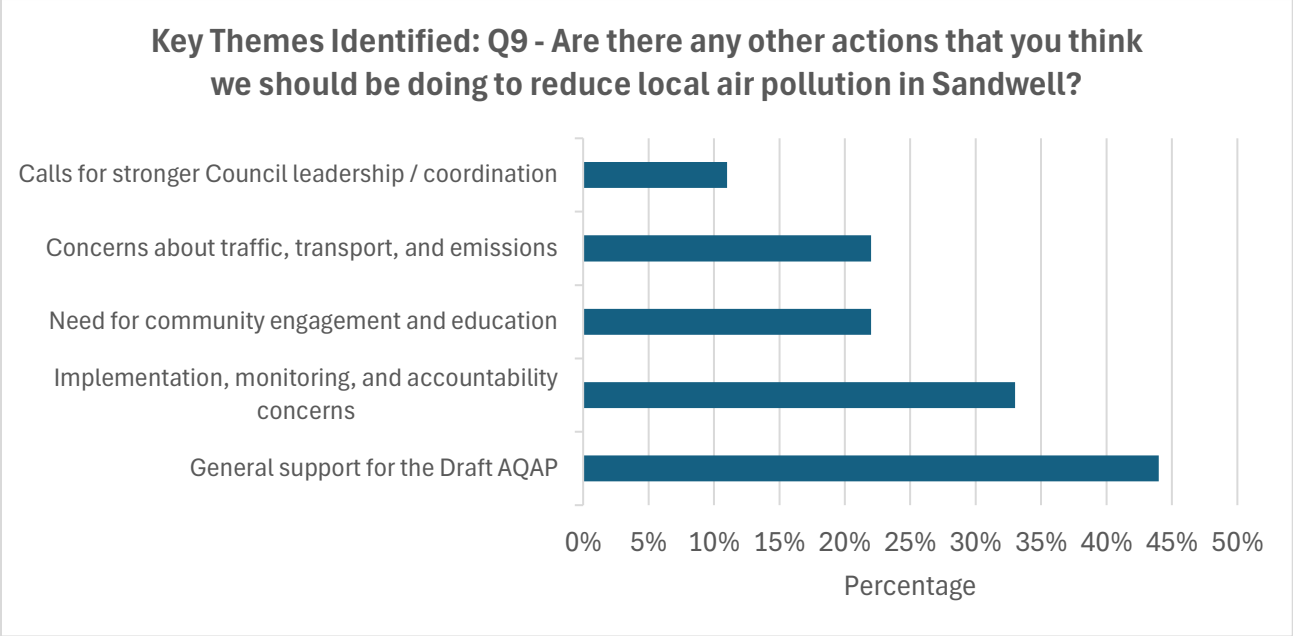
Q9. Do you have any other comments about the Draft Air Quality Action Plan?"

Total Responses: 9

Summary of Feedback

Respondents demonstrated broad support for the Draft Air Quality Action Plan (AQAP). 9 comments were received, they emphasised the need for stronger implementation, measurable outcomes, and

cross-departmental action. Several highlighted the importance of engaging communities and ensuring accountability for progress.



Quotes

"*The plan is a great start, it's good to see Sandwell taking action."*

"Fully support this initiative and hope it leads to real change."

"Please make sure this isn't another report that gathers dust."

"Engage communities, people will support it if they understand the benefits."

"Traffic management must be central to this plan; congestion is the real issue."

"The Council should lead by example and coordinate better across teams."

Key Takeaways

- The plan is welcomed by most respondents, but delivery and follow-up are key concerns.
- There is a call for transparency, community involvement, and clear metrics.
- The public expects visible leadership and ongoing communication about progress.

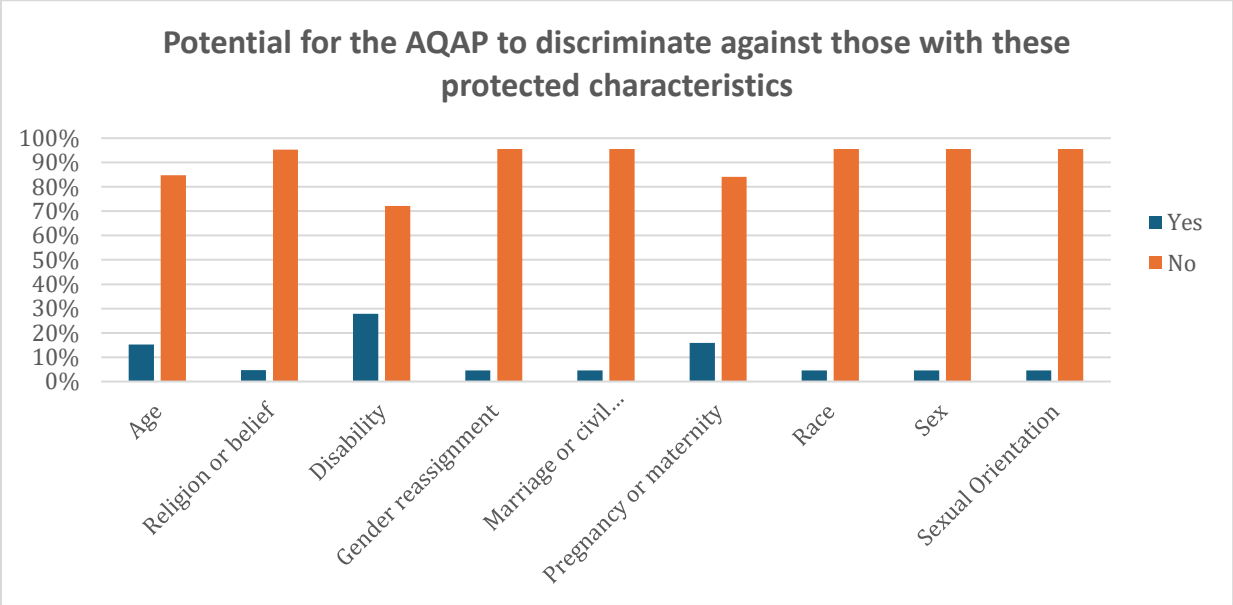
Q10. Are you aware of any negative impact that the AQAP could have on residents or visitors to Sandwell?

Out of 48 respondents, 15% said they were aware of possible negative impacts the AQAP could have on residents or visitors to Sandwell, while 85% said they were not aware of any.

Q11. Are you aware of any negative impact that the AQAP could have on Sandwell's businesses or economy?

Out of 48 respondents, 13% said they were aware of possible negative impacts that the AQAP could have on Sandwell's business or economy, while 875% said they were not aware of any.

Q11a. Do you think this AQAP could discriminate against someone because of their: age; religion or belief; disability; gender reassignment; marriage or civil partnership; pregnancy or maternity; race; sex; sexual orientation?

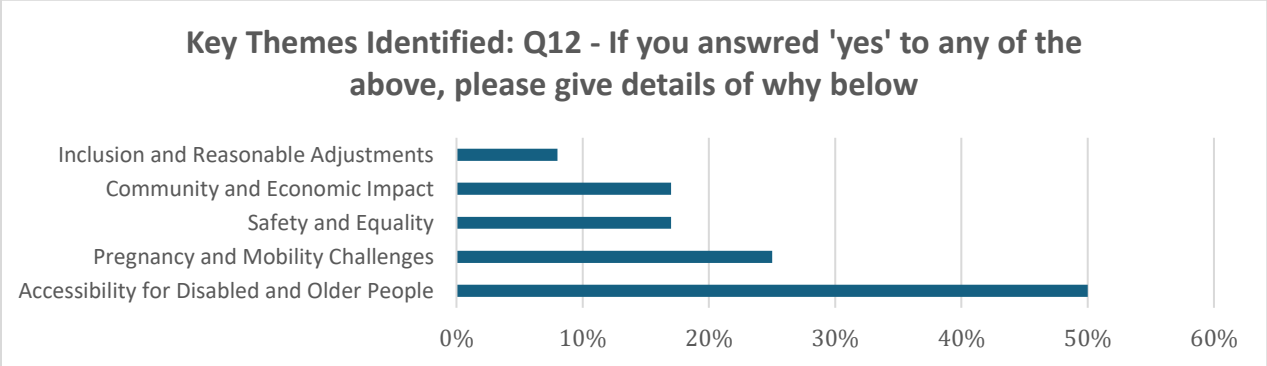


Q12. If you answered 'yes' to Q.10, Q.11 or Q11a, please give details of why below:

12 comments

Summary of Feedback

Predominantly negative/concerned (around 80%). Most comments express worries about reduced access, hardship for disabled or pregnant people, safety risks, and negative economic impacts. Whilst neutral to constructive (20%). A small number acknowledge equality or a willingness to make reasonable adjustments ("we would do our best to accommodate").



Quotes

"Older and disabled people rely on vehicles to get out. Any pedestrianised zones would mean these people are disadvantaged."

"If you are pregnant or just had a baby and can't park near the school, you could end up parking a good distance away."

"Parents want to ensure their children arrive to school safely."

Key Takeaways

- Access concerns, that restrictions may disadvantage disabled and older people.
- Pregnancy needs, requirement for close parking needed for pregnant women and new parents.
- Safety focus, parents prioritise children's safe travel.
- Local impact, around fears of harm to local shops and convenience for working parents.
- Inclusion and the need for reasonable adjustments and fair treatment.

Q13a "What lifestyle or behaviour changes would you be willing to make to reduce local air pollution? If you tick other, please specify in the comments box.

4 Responses

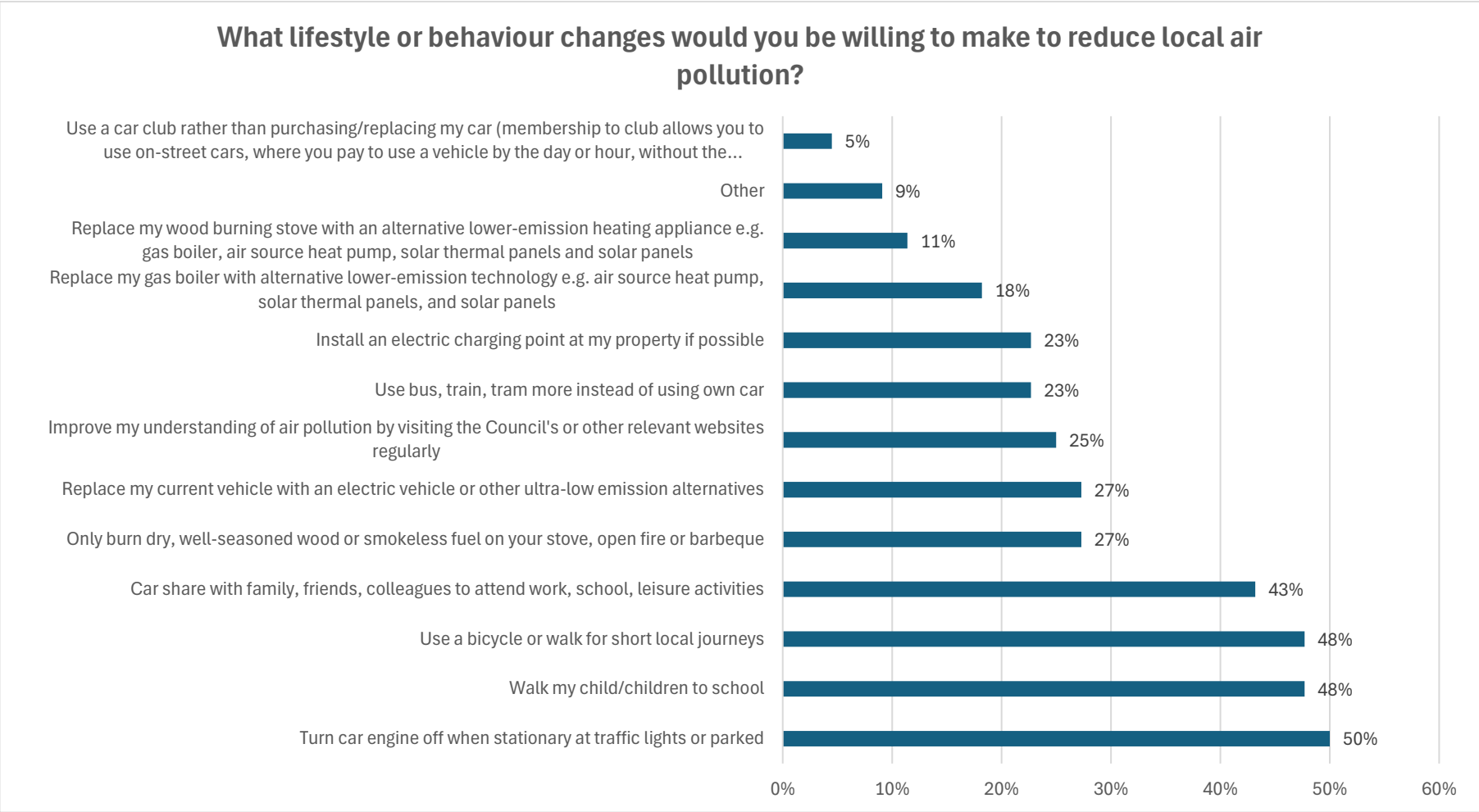
Only four responses were received, which fell into the following themes:

- Already sustainable habits. Some respondents do not drive and already walk or use public transport.
- Perception that air pollution is not a major issue. Belief that resources could be better spent elsewhere.
- Cost and practicality concerns. Lifestyle changes suggested are seen as unrealistic or expensive.
- Public transport reliability. Concerns about poor service making alternatives difficult.

Q14. What changes is your organisation willing to make to improve poor air quality?

Only one response was received with a tick to say that they would provide cycle infrastructure, such as bicycle storage for staff and visitors.

Q13. What lifestyle or behaviour changes would you be willing to make to reduce local air pollution?



This feedback demonstrates that respondents prefer low-cost, practical actions like turning off engines, walking, and short local trips over potentially more expensive or complex changes such as replacing heating systems or joining a car club.

VISION 2030 SANDWELL

BIG PLANS FOR A GREAT PLACE

...FOR THE PEOPLE OF SANDWELL

Sandwell Metropolitan Borough Council

Equality Impact Assessment

Sandwell Council's Air Quality Action Plan

2025-2030

You must consider the Equality Impact Assessment Guidance when completing this template.

The EDI team can provide help and advice on undertaking an EqIA and also provide overview quality assurance checks on completed EqIA documents.

EDI team contact email: edi_team@sandwell.gov.uk

Quality Control	
Title of proposal	Air Quality Action Plan
Directorate and Service Area	Adult Services, Health and Wellbeing
Officer completing EqIA	Elizabeth Stephens
Contact Details	elizabeth_stephens@sandwell.gov.uk
Other officers involved in completing this EqIA	Paul Meadows Andy Thorpe
Date EqIA completed	15/10/2025
Date EqIA signed off or agreed by Director or Executive Director	4/11/2025
Name of Director or Executive Director signing off EqIA	Frances Howie
Date EqIA considered by Cabinet	10/12/2025
Where the EqIA is Published **(please include a link to the EqIA and send a copy of the final EqIA to the EDI team)**	https://www.sandwell.gov.uk/AQAP

Section 1.

The purpose of the project, proposal or decision required

This proposal seeks approval and adoption of a revised Air Quality Action Plan (AQAP) for Sandwell for the period 2025–2030.

The development of an AQAP is a statutory responsibility for Sandwell Council, following the borough's designation as an Air Quality Management Area in 2005, which was prompted by widespread elevated levels of nitrogen dioxide (NO_2). Although NO_2 concentrations have declined in recent years they remain at concentrations that are harmful to health in many parts of the borough. Concern is also growing over the health impacts of fine particulate matter ($PM_{2.5}$), which continues to be present at elevated levels throughout the borough.

Sandwell's AQAP sets out a range of targeted actions to reduce local pollutant emissions generated from vehicle traffic, industry and homes. The aim of the plan is to create a cleaner, healthier and more sustainable borough for all.

Section 2.

Evidence used and considered. Include analysis of any missing data

A significant portion of the evidence informing this document has been drawn from existing sources, including Sandwell Trends and analysis conducted by AECOM Air Quality Consultants, who were commissioned to support the development of the Draft Air Quality Action Plan. Additional insights were derived from other Council strategies, documents, and research, as well as from two consultation surveys carried out between August and September 2025 in relation to the Draft AQAP.

Population and Age (Census Data 2021)
Age is relevant with regards to air pollution as children are especially vulnerable due to developing lungs and higher breathing rates, whilst older adults are more susceptible to pollution-related illnesses (e.g. heart disease, stroke, COPD, dementia)

- Sandwell has an estimated population of 347,5514.
- 49.2% of the population is male, 50.8% is female.
- The population density is 3,996 people per square kilometre. This is nearly ten times higher than the national average of 426.
- 14.5% are of pensionable age which is lower than the proportions for England and the West Midlands of 19%.
- 58% are aged between 20 and 65.
- Sandwell has a younger than average population, 22% aged 0 – 15, which is higher than the England and West Midlands averages of 18% and 19% respectively.
- Sandwell has a smaller population over the age of 65 than the rest of England.

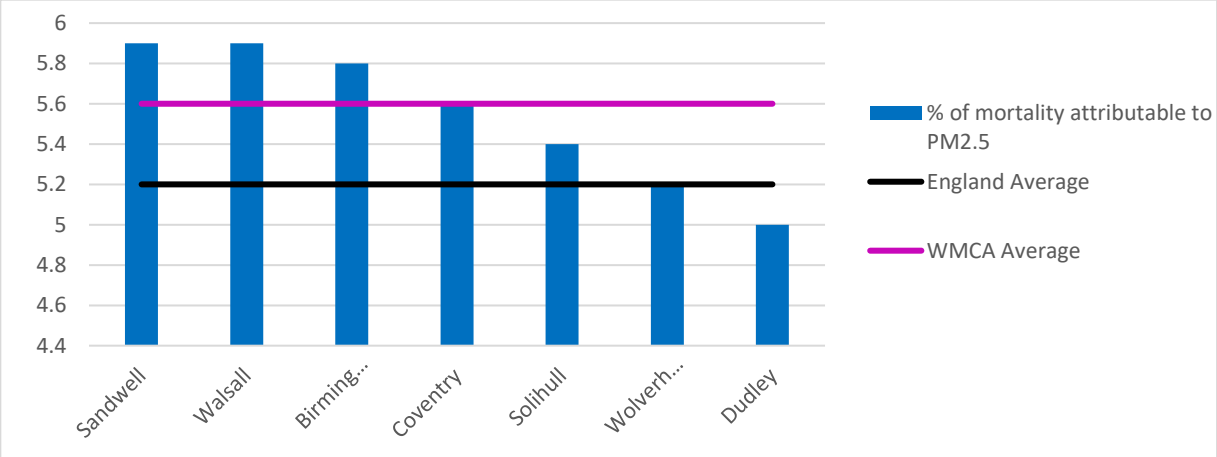
Deprivation

- Indices of Multiple Deprivation (IMD) 2019 shows Sandwell's average deprivation score ranked as the 12th most deprived local authority (LA) in England, out of 317 LAs.
- 62.1 % of households in Sandwell are deprived in at least one dimension or measure of household deprivation (compared with 51.7% in England & Wal
- The high levels of deprivation prevalent identified across large parts of the Borough place the population at increased vulnerability to the effects of air pollution.
- When exposure to $PM_{2.5}$ of a population is analysed using the Index of Multiple Deprivation (IMD) the two main pollution sources of $PM_{2.5}$ and NO_2 from domestic burning and transport contribute most significantly to the differences in $PM_{2.5}$ exposure across communities. Research demonstrates that their impact is greater in more deprived areas, meaning people in poorer neighbourhoods are more exposed to harmful air pollution from traffic and wood burning. Essentially air pollution from vehicles and wood burning disproportionately affects the most disadvantaged communities.

Health and Air Pollution

- In Sandwell, only 40.8% of people reported very good health (47.5% in England & Wales).
- 8% reported bad or very bad health (5.4% in England & Wales).
- The Public Health Outcomes Framework data for Sandwell (2023) demonstrated that the fraction of mortality attributable to particulate ($PM_{2.5}$) air pollution was 5.9%. This is on a par with Walsall and higher than any other local authority in the West Midlands and the England average of 5.2%.

A comparison of the Fraction of Mortality Attributable to $PM_{2.5}$ Air Pollution within the West Midlands Local Authorities (2023)



- Sandwell has sustained the highest percentage burden of mortality attributable to $PM_{2.5}$ in the West Midlands region since 2018.
- There were significant reductions in $PM_{2.5}$ air pollution in Sandwell between 2018 and 2021 along with associated mortality from air pollution. This was due to the reduced traffic on the roads (particularly associated with the COVID-19 pandemic), which resulted in less $PM_{2.5}$ (tyre and brake wear). Sandwell JSNA - Chapter 5: Place (Healthy Urban Development)

- An assessment examining the unequal exposure to fine particulate matter ($PM_{2.5}$) across communities in England, with a focus on how socio-economic deprivation influences air pollution impacts found:
    - Primary Pollution Sources: Road transport and domestic wood burning are the two most significant contributors to $PM_{2.5}$ exposure disparities.
    - Exposure Bias: Research from Imperial College London (2024) shows that $PM_{2.5}$ exposure is 0.88 µg/m³ higher in the most deprived communities compared to the least deprived, based on the Index of Multiple Deprivation (IMD). www.uk-air.defra.gov.uk/assets/documents/reports

- In 2021/22 hospital admissions for asthma in children and young people under 19 years old were higher in Sandwell than in England and the West Midlands. There were 207.4 admissions per 100,000 in 2021/22 in Sandwell compared to 165.6 for West Midlands and 131.5 for England. This is partially explained by the higher proportion of children aged 0-15 but also due to the air pollution burden. https://www.sandwelltrends.info/wp-content/uploads/sites/5/2024/09/JSNA-Chapter-2b-Grow-Well-Apr-24.pdf

Households

There are 130,246 households with residents in Sandwell.

- 80.8% live in a house or bungalow
- 19% live in a flat, maisonette or apartment
- 0.1% in a caravan.
- <0.1% on a canal boat

Heating of Homes

- 98.2% of households in Sandwell have central heating but only 0.3% use at least one renewable energy source (compared with 0.9% in England & Wales).
- We have no data on how many properties in Sandwell have wood burning stoves or open fireplaces. It is estimated 8% of households in the UK have wood burning stoves or open fire places. Research puts this percentage as being higher in more affluent areas and lower in more deprived areas. (Kantar 2020). Using the average figure of 8% this equates to approximately 10,419 properties in Sandwell using a wood burning stove or open fireplace.
- Nationally, domestic solid fuel (wood) burning is a re-emerging area of concern. In 2021 domestic burning of solid fuels accounted for 27% of all $PM_{2.5}$ emissions nationally. (Air Quality Strategy: Framework for Local Authority Delivery).
- Wood burning stoves account for 6% of energy consumption in the UK but they are responsible for around 40% of the UK's social-health* related costs from home heating. (European Public Health Alliance 2022).
  **Social-health related social costs (these are calculated using direct (health care) expenditures (e.g. hospital admissions, loss of working days) and indirect health impacts and accompanied welfare loss (e.g. managing diseases such as COPD, increased mortality risk from heart attacks and stroke and reduced life expectancy) (https://epha.org/replacing-fossil-fuels-and-biomass-with-cleaner-alternatives-in-residential-heating-and-cooking/*
- Boaters are the one group of householders that are normally reliant on solid fuel for space heating. In Sandwell there are 43 long-term (6 month +) residential boat moorings.

Travel to Work

Reducing private car use for journeys to work supports improvements in local air quality. Census 2021 data was taken during the COVID-19 pandemic, so this is only indicative data as it impacted the uptake of public transport and active travel.

- Census 2021 estimates that 26,350 (18.7%) usual residents aged 16 years and over in employment in Sandwell worked mainly at or from home. This compares with 31.2% nationally.
- The most selected mode of travel to work was driving a car or a van (52.9%, 74,590 of all usual residents aged 16 years and over in employment).
- 29.2% (38,090) of Sandwell households had no access to a car or van, this is higher than the 23.3% average for England & Wales in 2021.

Active Travel

Data from the Active Lives Survey and National Travel Survey reveals that:

- The proportion of people in Sandwell who walked for over 10 minutes or cycled for any reason was consistently lower than both regional and national averages.
- Compared to England overall, Sandwell's rates were 19–35% lower.
- Compared to the West Midlands, Sandwell's rates were 9–18% lower.

Sources of the Main Air Pollutants in Sandwell

The two main air pollutants of concern are $PM_{2.5}$ and NO_2. A source apportionment study was undertaken by AECOM consultants for Sandwell Council in 2025, as discussed in Sandwell's Draft Air Quality Action Plan 2025-2030.

In Sandwell the main sources of $PM_{2.5}$ were from:

- Domestic burning e.g. wood-burning stoves and bonfires - approx. 25%
- Vehicle tyre and brake wear- non-exhaust sources that still release fine particles into the air – approx. 22%
- Industrial processes – approx. 9%

The main sources of NO_2 in Sandwell were from:

- Road transport (43%) including diesel vehicles - these produce higher NO_2 levels than petrol vehicles
- Industrial combustion (31%)

Traffic count data for the Birmingham Road in 2023 and ANPR fleet analysis data was used, alongside background pollutant concentration data from Defra. The data demonstrated that vehicles in Sandwell were more polluting than the national average placing the population at greater risk to the impacts of transport related air pollution.

- 43.6% of petrol cars were Euro 6 (against a national 56.2%).
- 38.9% of diesel cars were Euro 6 (against a national 48.8%).
- Sandwell has more polluting Euro 3, 4, and 5 cars.
- LGVs (Light Goods Vehicles) and rigid HGVs (Heavy Goods Vehicles) in Sandwell are older than the national average.
- 56.2% of petrol cars in Sandwell meet Euro 6 emissions standards, compared to 66.8% nationally.
- 65.3% of rigid HGVs in Sandwell are Euro 6 compliant, versus 78.5% nationally.

- The articulated HGV fleet in Sandwell is more aligned with national standards, most likely because these vehicles travel longer distances and use the strategic road network that runs through Sandwell.
- Sandwell's bus fleet is older than the rest of the UK, with a higher proportion of buses classified as Euro III and Euro IV, resulting in more polluting emissions.

Pregnancy / Maternity Rates in Sandwell
In 2022 the number of live births in Sandwell was 4,330, with a fertility rate of 1.87 which is higher than the average of 1.49 for England and Wales. Pregnant women who are exposed to poor air quality, have an increased risk of adverse birth outcomes, maternal health complications and long-term child health risks, as discussed below.

Infant Mortality in Sandwell - (JSNA) Chapter 2a: Starting Well (April 2024).
When a mother is exposed to air pollution during pregnancy it increases the risk of babies being born too small or too early, these are both major risk factors for infant mortality.

Sandwell's infant mortality rate is higher than the national average.
- Between 2015 and 2019, Sandwell consistently recorded higher rates than both England and the West Midlands region.
- In 2023, Sandwell logged a mortality rate of 4.98 deaths per 1,000 births, compared to a group average of 4.05 (i.e. other trusts that offer level 3 neonatal intensive care and serve high-deprivation areas).

Low Birth Weight in Sandwell – (JSNA) Chapter 2a Starting Well (April 2024)
This is defined as babies born weighing under 2,500g, including both live and stillbirths. Although there are many factors which impact low birth weight, scientific studies have demonstrated a significant association between exposure to air pollution during pregnancy and lower birth weight in newborns. Specifically, higher levels of particulate matter (PM2.5 and PM10), nitrogen dioxide (NO2), and black carbon (BC) have been linked to reduced birth weight.

- Sandwell's rates have been consistently higher than England and the West Midlands average since 2018.
- In 2021, the percentage of low-birth-weight babies in Sandwell was 8.8%, compared to: 6.8% in England and 7.9% in the West Midlands.

Socio-Economic and Ethnic Disparities
While income is not a protected characteristic under the Equality Act 2010, socio-economic status intersects significantly with protected characteristics, particularly ethnicity. Sandwell is highly diverse, with 48% of residents from ethnic minority backgrounds, compared to 26% nationally. Lower socioeconomic status often correlates with higher exposure to air pollution due to proximity to traffic, industry and/or poor housing conditions, all of which compound the health risk.

Income Disparities
Ethnic minority groups in England and Wales tend to have lower average incomes than White British people. According to the ONS (2022), employees from Bangladeshi, Pakistani, African, Caribbean, and other Black ethnic backgrounds consistently earn less than White British employees.

Wealth Inequality (ONS

- Households with a Bangladeshi head were 18 times less likely to be in the top wealth quintile than White British households.
- Black African-headed households were nine times less likely to reach this wealth bracket.
- 44% of Black African and Other Asian households had financial debts exceeding their financial assets, making them twice as likely to be financially vulnerable compared to White British households.

Fuel Poverty **(Ethnicity Facts and Figures – www.gov.uk - 2022)**
As of 2019, 20% of ethnic minority households were in fuel poverty compared to 13% of white households. Although ethnic minority households tend to have a lower average fuel poverty gap (the amount needed to lift them out of fuel poverty), they remain disproportionately affected by high energy costs and poor housing efficiency.

Income and disability **(ONS 2022 - Disability Pay Gaps in the UK)**
There is a disability pay gap in the UK, measured as the gap between median pay for disabled employees and non-disabled employees. It was 13.8% in 2021 and has been increasing since 2014 (11.7%).

Disability
Under the Equality Act 2010, 20% of Sandwell's residents are disabled, which is higher than the West Midlands regional average of 19.1% and notably higher than the national average of 17.7%. These figures align with broader patterns of higher disability prevalence in more deprived or industrial areas. Those living with disability are often more likely to be more exposed and more impacted by air pollution than non-disabled for a variety of reasons, including:

- Underlying respiratory conditions (e.g., asthma, COPD) and cardiovascular diseases which are exacerbated by poor air quality
- Neurological conditions that may be affected by long-term exposure to pollutants, which can impair cognitive function or worsen symptoms (e.g. dementia)
- Limited ability to avoid exposure to air pollution - due to accessibility, mobility and costs
- Communication and awareness barriers - do not always receive the health advice in an accessible form
- More likely to live in low-income areas with more traffic, industry etc.
- Spend more time indoors, can experience poor ventilation, exposure to solid fuels/chemicals or poorly maintained air conditioning in residential settings.

Religion
The 2021 census regarding religious identity was completed by 96.4% of respondents in Sandwell, and a breakdown is provided in the table below.

Religion	Number of People	Percentage of Population
Christian	136,350	39.9%

No Religion	89,100	26.1%
Muslim	45,760	13.4%
Sikh	39,250	11.5%
Hindu	9,447	2.8%
Buddhist	943	0.3%
Jewish	79	<0.1%
Other religions	~300+	~0.1%

While religion itself is not directly linked to pollution exposure, ethnic disparities which may correlate with religious identity have been documented for example:

- Minoritised ethnic groups (including South Asian, Black, Chinese, and Arab communities) face higher exposure to NO_2 and PM2.5, even when controlling for deprivation. ncas.ac.uk - 17 Jan 2025
- Black communities experience the highest levels of multiple disadvantage pollution, poverty, and health vulnerability ukdataservice.ac.uk - June 2025
- Bangladeshi and Pakistani groups face up to 40% higher exposure to particulate matter than matched white groups ukdataservice.ac.uk - June 2025.

Section 3.

Consultation

Both a general and schools-focused public consultation were conducted in August and September 2025 to assess the potential equality impacts of Sandwell's proposed Air Quality Action Plan (AQAP).

Demographics of those who participated in the consultation.
A total of 220 individuals participated in the public and schools-focused consultations on Sandwell's proposed Air Quality Action Plan (AQAP) during August and September 2025. The demographic profile of respondents is summarised below:

- Ethnicity: 73% identified as White British, with 6% Indian, 4% Other White background, and 2% African, Caribbean, or Pakistani. Other ethnic groups, including Sikh, Jewish, and Bangladeshi, each accounted for 1%, with less than 1% representation from all remaining nationalities.
- Religion: 41% identified as Christian and 37% reported no religious affiliation. Sikh (5%), Muslim (3%), Hindu (1%), Jewish (1%), and Other religions (2%) were also represented. No respondents identified as Buddhist, and 12% preferred not to disclose.
- Sex: 64% of respondents were female and 36% male.
- Age: The majority of respondents (67%) were aged between 35 and 64. Other age groups included: 16–24 (4%), 25–34 (16%), 65–74 (10%), 75+ (2%), and 2% preferred not to say. No respondents were under 16.

- Health and Disability: 11% reported a longstanding illness or health condition, 9% a physical disability, and 8% a mental health condition. Smaller proportions reported learning difficulties (2%), hearing impairments (1%), or other conditions (4%). No respondents reported visual impairments.

In summary the results of the consultation demonstrate:

Overrepresentation of: White British, women, adults aged 35–64
Underrepresentation of: Ethnic minorities (especially Black and South Asian groups), young people, men, and the visually impaired
Fair representation of: Religious affiliation and health conditions (broadly)

These insights will be used to help inform future engagement strategies.

Results from the consultation survey
Respondents were informed that the AQ Action Plan was proposing the following 21 measures.

1.	Expanding school streets
2.	Active and sustainable travel planning
3.	Road speed reductions on certain roads
4.	Produce updated air quality guidance to support planning application decisions
5.	The promotion of active travel (e.g. walking and cycling)
6.	Roll out of the Auntie Duck Children's Air Quality Education Programme to all primary schools in Sandwell
7.	Contribute to and promote an accredited air quality education scheme for primary and secondary schools which aligns with the national curriculum funded by the West Midlands Combined Authority
8.	Education and enforcement of Sandwell's Smoke Control Order – controlling smoke emissions from chimneys
9.	Providing advice and guidance on planning applications to ensure air pollution is minimised during construction and when development is in use
10.	Targeted public health engagement campaigns to raise awareness of air pollution
11.	Creation of new cycle lanes / infrastructure
12.	Raise awareness of harms from domestic burning e.g. log burning stoves and bonfires
13.	Partner with the West Midlands Combined Authority to support the implementation of the West Midlands Air Quality Framework
14.	Ensure Sandwell's interests are embedded into the West Midlands Local Transport Plan, to maximise local air quality benefits
15.	Work with trusted community leaders to improve knowledge and ownership of Air Quality to enable them to create their own initiatives
16.	Review how money obtained from the Community Infrastructure Levy and Section 106 agreements can be best spent
17.	Issue environmental permits to all businesses that require them and ensure on-going air quality compliance
18.	Work with the Environment Agency to ensure Sandwell businesses achieve on-going air quality compliance
19.	Replacement of existing Council vehicle fleet for zero-emission vehicles in line with the government's 2035 path to zero emissions vehicles

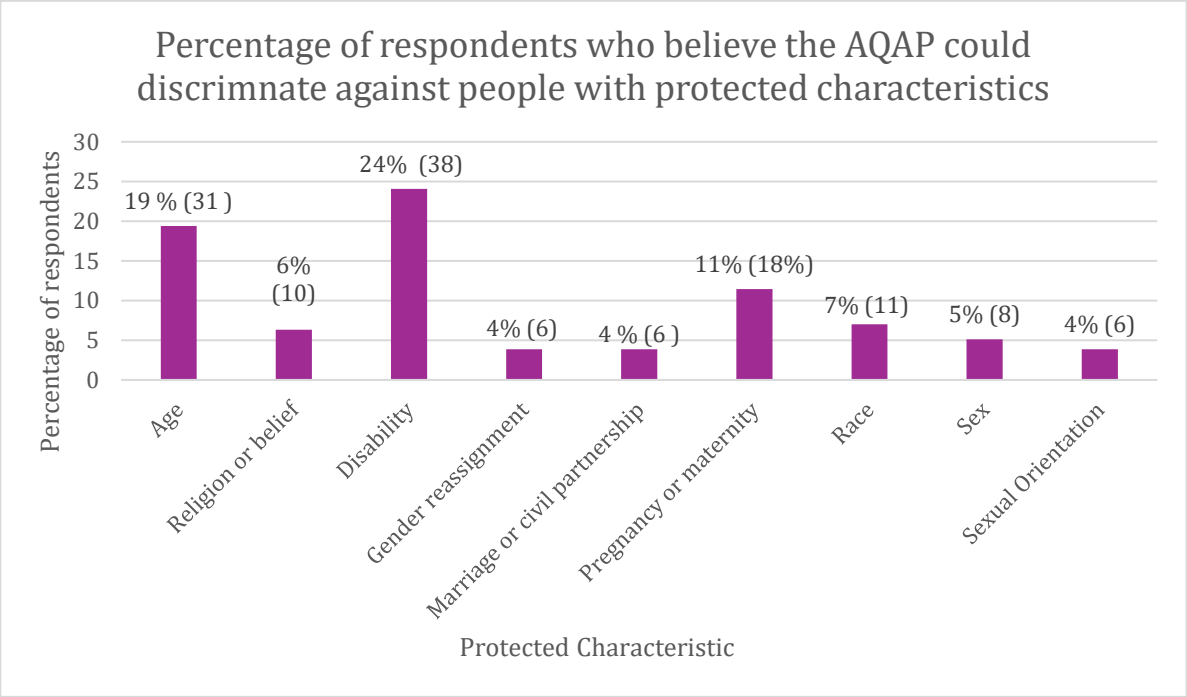
20.	Partnership working with NHS health professionals e.g. school nurses, asthma specialists
21.	Maintenance of the existing Air Quality council website to provide information on air quality matters

After answering a number of questions about the proposed measures, respondents were asked the following questions:

Do you think this AQAP could discriminate against someone because of their:	Yes	No
Age	☐	☐
Religion or belief	☐	☐
Disability	☐	☐
Gender reassignment	☐	☐
Marriage or civil partnership	☐	☐
Pregnancy or maternity	☐	☐
Race	☐	☐
Sex	☐	☐
Sexual Orientation	☐	☐

The percentage of people who believe that the AQAP could discriminate against individuals with a protected characteristic is shown below.

(The actual number of respondents who selected "yes" is provided in brackets next to each percentage.)



The results demonstrated that the greatest concern about the AQAP was in relation to disability (24%), followed by age (19%), and pregnancy or maternity (11%).

Respondents who answered yes to any of the above questions were then asked to provide further information explaining why they believed the AQAP might be discriminatory towards

individuals with these protected characteristics. A total of 34 comments were received which have been grouped into key themes, with the number of respondents who raised concerns within each theme noted. Some respondents raised concerns that spanned multiple themes.

No reasons/comments were given by those who had ticked yes, because they believed that the draft AQAP discriminated on grounds of religion/belief, gender reassignment, marriage/civil partnership or sexual orientation.

Theme	Protected Characteristic	Summary of comments	Number of Comments
Impact on Older People	Age	• Older people incur financial strain from fines, vehicle upgrades, or digital-only resources. • Older people have inability to walk or cycle long distances. • Older people have reliance on cars for independence and daily life. • Lack of access to educational materials if only available digitally.	14
Impact on Disabled People	Disability	• Reduced car access may isolate disabled individuals. • Active travel infrastructure may not be usable by all disabled people. • Public transport is overcrowded, unsafe, and lacks wheelchair space. • Diminishing disabled parking spaces. • Blanket enforcement of active travel may discriminate against those unable to walk or cycle. • Hidden disability and neurodiverse children's needs make alternative transport difficult	19
Impact on Pregnant Women / New Mothers	Pregnancy or Maternity	• Public transport is unsafe and lacks seating for pregnant passengers. • Cost and practicality of cycling or walking with children.	6
Impact on Children / Parents (Age)	Age	• Public transport is unsafe and lacks seating for pregnant passengers. • Cost and practicality of cycling or walking with children.	3
Impact on Women (Sex)	Sex	• Women feel unsafe walking, especially with children. • Public transport is perceived as unsafe due to antisocial behaviour.	1
Impact on low-income and ethnic minority communities	Race	• Risk of further inequality if implementation isn't geographically sensitive. • Charging for older vehicles disproportionately affects low-income households.	2

Section 4.

Summary assessment of the analysis at section 4a and the likely impact on each of the protected characteristics (if any)

Concerns raised about the policy with regards to age, disability, race, income and pregnancy/new mothers have been analysed and assessed. This assessment demonstrates that the overall impact of the Air Quality Action Plan and the 21 proposed measures is deemed as being positive.

Positive impacts
Many of the measures directly support equality and inclusion:

- School Streets (measure 1) can improve access for disabled parents or carers who rely on vehicle transport by reducing unnecessary traffic near schools during drop-off and pick-up times. By limiting vehicle access to only those who genuinely need it, such as families with mobility challenges the initiative can create a safer, calmer environment that supports equitable access for all.

- Education programmes (measures 6, 7, 10, 15, 20) promote awareness and health, especially for children and vulnerable groups.

- Active travel and infrastructure (measures 2, 5, 11) encourage walking and cycling and can benefit low-income groups and those without access to cars.

- Fleet replacement (measure 19) will help to reduce emissions from council vehicles and may improve air quality in areas with higher deprivation or health inequalities.

- Community engagement (measure 15) includes working with trusted leaders, this can help tailor initiatives to diverse communities.

Potential risks if measures are not implemented carefully

While not discriminatory by design, some measures could disproportionately affect certain groups if they are not implemented carefully:

- School Streets (measure 1) must ensure that accessibility is preserved for those who need it (for a wide range of reasons). This should be achieved through separate EqIAs on a school-by-school basis.

- Cycle infrastructure (measure 11), needs to be inclusive as some disabled people may not be able to use standard bikes, so inclusive design (e.g. adapted cycles, safe crossings) is important.

- Domestic burning awareness (measure 12) must be sensitive to cultural practices and economic realities (e.g. households who rely on solid fuel for heating).

- Planning guidance and enforcement (measure 4, 8, 9, 17, 18) must be applied fairly across all communities and businesses, avoiding disproportionate scrutiny or burden.

Section 4a - What are the potential/actual impacts of the proposal on the protected characteristics?

Protected Characteristic as per Equality Act 2010	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Age	**P**	• **Children and Young People**: Improved air quality can lead to a reduction in respiratory conditions such as asthma and bronchitis, enhance cognitive development, and promote safer active travel to school. Cleaner air also supports healthier growth and long-term wellbeing. • **Older Adults**: Reduced levels of air pollution can decrease the incidence and severity of cardiovascular and respiratory diseases, improve quality of life, and support independent living. This is particularly important for those suffering with pre-existing health conditions. • **Working-age Adults**: Cleaner air contributes to improved productivity, fewer sick days, and better health outcomes for those exposed to pollution during commuting or outdoor work.	• Ensure the use of wide range of engagement methods to ensure that no age group is disproportionately disadvantaged. This includes ensuring inclusive and accessible information including non-digital formats and targeted outreach to older adults and families. • Collaborate with Highways and Transport teams to ensure that mobility and accessibility needs are addressed when infrastructure changes are planned, including School Streets, particularly for older residents. • Provide clear, age-appropriate communications on the health benefits of air quality improvements being implemented.	

Protected Characteristic as per Equality Act 2010	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Disability	**P**	• **Health improvements**: People with respiratory conditions such as asthma, COPD, or cardiovascular disease, many of whom may be considered disabled under the Equality Act 2010, are particularly vulnerable to air pollution. Reducing pollutants like NO_2 and $PM_{2.5}$ can lead to fewer exacerbations, hospital admissions, and improved quality of life. • **Enhanced public spaces**: Measures that reduce traffic and promote cleaner environments can make public spaces more pleasant and **more accessible** for disabled individuals, including those with sensory sensitivities, neurodivergence or mobility impairments. This includes measures such as 'School Streets' which can prioritise those who may need priority access in a vehicle. • **Support for active travel**: Cleaner air and quieter streets may encourage more disabled people to engage in walking or wheeling, where appropriate, contributing to physical and mental wellbeing. • **Engagement barriers**: Non-inclusive communication methods (e.g. online-only formats, lack of Easy Read materials, absence of British Sign Language interpretation, or poor screen reader compatibility) can exclude disabled people from participating meaningfully in the implementation of air quality measures.	• Engage with disability advocacy groups where appropriate to identify and address specific needs e.g. the implementation of new built infrastructure or the introduction of a 'School Street'. • Ensure all communications and engagement materials are available in accessible formats, including Easy Read, large print, audio, and non-digital and digital formats compatible with assistive technologies.	Air Quality Team Air Quality Team

Protected Characteristic as per Equality Act 2010	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Gender Reassignment	**Ne**	The proposed measures are universally applicable and do not differentiate based on gender reassignment. However, the overall health benefits associated with cleaner air are expected to contribute positively to reducing health inequalities, which may indirectly benefit individuals across all protected characteristics, including those who have undergone gender reassignment.		
Marriage and civil partnership	**Ne**	The proposed measures are universally applicable and do not differentiate based on persons being married or in a civil partnership. However, the overall health benefits associated with cleaner air are expected to contribute positively to reducing health inequalities, which may indirectly benefit individuals across all protected characteristics including those who are married or in a civil partnership.		
Pregnancy and maternity	**P**	• **Improved maternal and infant health**: Reducing air pollution can lower the risk of complications during pregnancy and improve outcomes for newborns, including respiratory health and early development. • **Support for caregivers**: Cleaner air benefits those caring for infants and young children, who are more susceptible to pollution-related health issues. • **Enhanced public spaces**: Measures that reduce traffic and promote green infrastructure should create safer, more pleasant environments for pregnant individuals and parents with young children.	• Provide flexible and inclusive engagement opportunities, including online formats and targeted outreach to maternity groups and family services about any air quality measures. • Ensure that pregnant/new mothers and access requirements are part of the consultation process for any new School Street. • Monitor the impact of AQAP measures on maternal and infant	Air Quality Team / Public Health Air Quality Team / Public Health Air Quality Team / Public Health

Protected Characteristic as per Equality Act 2010	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
		• **Engagement barriers**: Pregnant women and new parents may face time constraints or physical limitations that reduce their ability so may not be as engaged with new air quality measures such as School Streets so miss opportunities to voice concerns.	health outcomes where appropriate and consult with health care professionals.	
Race	**P**	42% of residents in Sandwell are from Black, Asian and minoritised ethnic communities, this is higher than both the West Midlands and England overall. • **Health equity**: Ethnic minority communities are more likely to live in urban areas with higher traffic density and poorer air quality. Reducing pollution in these areas can lead to significant improvements in respiratory and cardiovascular health outcomes. • **Environmental justice**: Targeted interventions in pollution hotspots can help address long-standing environmental inequalities affecting racially and ethnically diverse communities. • **Community wellbeing**: Cleaner air and improved public spaces can enhance quality of life, reduce stress, and support healthier lifestyles in communities that have historically been underserved. • **Engagement barriers**: Language, cultural differences, and mistrust of the Council may limit participation in future decision-making processes.	• Ensure inclusive engagement by providing translated materials where required, undertake culturally sensitive outreach, and collaboration and work with trusted community leaders and organisations. • Where possible, monitor the impact of measures across different racial and ethnic groups to identify, prevent and if necessary, address any disparities.	Air Quality Team Air Quality Team

Protected Characteristic as per Equality Act 2010	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Religion or belief	**P**	• **Health benefits for congregants**: Improved air quality can benefit individuals attending places of worship, many of which are in areas with high traffic and pollution levels. This is particularly important for older worshippers or those with health conditions. • **Enhanced community environments**: Cleaner air and improved public spaces can support religious gatherings, festivals, and outdoor ceremonies, contributing to community wellbeing. • **Support for faith-based outreach**: Faith organisations often play a role in health promotion and community support. Promotion and support of measures in the AQAP can enhance their ability to deliver services in healthier environments. • **Engagement barriers:** Ensure that we actively include faith communities to ensure that their specific needs and perspectives are not overlooked.	• Engage proactively with faith groups and places of worship during consultation and implementation phases to understand and address specific access needs. • Provide inclusive communication materials that are culturally sensitive and available through community networks, including faith-based organisations.	Air Quality Team Air Quality Team
Sex	**Ne**	• **Health benefits**: Reducing air pollution contributes to improved respiratory and cardiovascular health for all genders. Women, particularly during pregnancy, benefit from reduced exposure to pollutants that are linked to adverse birth outcomes. • **Support for caregivers**: Women are statistically more likely to be primary caregivers for children and older adults. Improved air quality can enhance the	• Engage proactively with residents to highlight the co-benefits of participation in active travel such as health and safer environments. • Ensure that barriers/concerns are shared with appropriate teams for example improved lighting and design to accompany active travel	Air Quality Team Air Quality Team

Protected Characteristic as per Equality Act 2010	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
		health of those they care for and reduce the burden of managing pollution-related illnesses. • **Safer environments**: Measures that reduce traffic and promote active travel, such as School Streets, new cycle lanes, and pedestrian-friendly infrastructure, can significantly improve the safety and accessibility of public spaces. These changes often lead to: – reduced vehicle dominance, which lowers the risk of road traffic accidents and creates calmer, more navigable streets. – increased footfall and visibility, which can deter antisocial behaviour and enhance perceptions of safety.	infrastructure should be included to make spaces feel more secure.	
Sexual Orientation	**Ne**	The proposed measures are universally applicable and do not differentiate based on persons due to their sexual orientation. However, the overall health benefits associated with cleaner air are expected to contribute positively to reducing health inequalities, which may indirectly benefit individuals across all protected characteristics, including sexual orientation.		
Care Experienced (as per SMBC commitment from January 2025)	**P**	**Care experienced individuals can face** significant disadvantage across health, education, housing, and employment. Many care experienced people are more likely to live in areas with poorer environmental conditions, including higher levels of air pollution. • **Health improvements**: Care experienced individuals may have higher rates of physical and mental health	Collaborate with Sandwell's Kids in care and youth organisations to ensure inclusive engagement and communication in the future.	Air Quality Team / Public Health

Protected Characteristic as per Equality Act 2010	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
		issues, which can be exacerbated by poor air quality. Reducing pollution can contribute to better long-term health outcomes. • **Environmental equity**: AQAP interventions in deprived or high-pollution areas can benefit care experienced individuals who are more likely to live in social housing or transitional accommodation in these locations. • **Support for wellbeing**: Cleaner, safer public spaces can promote social inclusion and mental wellbeing, particularly for young people leaving care who may lack stable support networks. • **Engagement barriers**: Care experienced individuals may be less likely to actively participate in consultations or may lack of awareness of measures being undertaken. They may also have a mistrust of institutions like the Council.		

How could other socio-economic groups be affected?				
• **Carers** • **Low-income groups** • **Veterans/Armed** • **Forces Community**	**Ne**	The proposed measures are universally applicable and do not differentiate based on persons due to their socio-economic status. The overall health benefits associated with cleaner air are expected to contribute positively to reducing health inequalities, which may indirectly benefit individuals within these socio-economic groups.		

If there are no adverse impacts or any issues of concern or you can adequately explain or justify them, then please move to Sections 6.

5. What actions can be taken to mitigate any adverse impacts?

Although the assessment has not identified any adverse impacts, actions will be needed to ensure that the plan is implemented equitably and to mitigate any unintended adverse impacts. The following actions should therefore be undertaken:

- Conduct Equality Impact Assessments (EqIAs) for any new 'School Street' and vehicle speed limit reduction interventions.
- Engage with diverse communities during implementation of measures to understand lived experiences and address needs.
- Ensure accessibility is included in built infrastructure
- Ensure accessibility of information
- Regular monitoring of outcomes of measures where appropriate, to identify any disparities
- Ongoing evaluation of any complaints as part of the regular 6 monthly review, to ensure that it is not operating in a discriminatory manner.

6. Section 6: Decision or actions proposed

Overall, it is considered that the Air Quality Action Plan will have a net positive impact. To ensure Sandwell's Air Quality Action Plan does not result in discrimination either directly or indirectly, robust and inclusive monitoring arrangements should be put in place. These will be used to assess both the implementation and impact of the plan across all protected characteristics under the Equality Act 2010.

7. Monitoring arrangements

The AQAP will be subject to periodic review at the AQAP 6 monthly steering group meetings and ensure the monitoring and evaluation of the action measures as they are implemented. Examples of the types of monitoring that will be used are provided below:

Equality Impact Monitoring

- Equality Impact Assessments (EqIAs) conducted for each School Streets before implementation.
- Equality Impact Assessments conducted for road speed limit proposals
- Annual reviews of EqIAs
- Include feedback from diverse community groups in EqIA reviews.

Inclusive Engagement Tracking

- Monitor future participation in consultations and engagement activities by demographic group (e.g. age, disability, ethnicity, gender identity).
- Use inclusive formats (printed, Easy Read, BSL, translated materials, etc.) and track uptake.
- Partner with organisations supporting vulnerable groups (e.g. care leavers, disabled people, ethnic minorities) to ensure representation.

Complaint and Feedback Mechanisms

- The Pollution Control team has clear, accessible channels for individuals to report concerns or discrimination on the Council's Air Quality webpages.
- Respond transparently and adjust measures where necessary.

Data Collection and Analysis

- Collect anonymised data on health outcomes, travel patterns, and air quality impacts across different communities.
- Use mapping where appropriate to identify geographical hotspots or impacts of measures undertaken
- Monitor impact of infrastructure changes (e.g. School Streets, cycle lanes)

Partnership Reviews

- Work with NHS, schools, youth organisations, and community leaders to review impacts on specific groups (e.g. children with asthma, disabled residents).

Reporting

- Publish the Annual Air Quality Status Report detailing pollutant concentrations, trends, and their impact on population health across Sandwell.
- Feature case studies and personal testimonials from residents, workers, and community leaders to highlight lived experiences and bring a human perspective to the data.
- Ensure accessibility of all reports, including Easy Read formats, screen reader compatibility, and translated versions where needed.
- Invite public feedback and comment to promote transparency, accountability, and community ownership.

Section 8 Action planning (if required)

Question no. (ref)	Action required	Lead officer/ person responsible	Target date	Progress

If you have any suggestions for improving this process, please contact EDI_Team@Sandwell.gov.uk